

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:)	Mail Stop APPEAL BRIEF - PATENTS
)	
Urs HOELZLE et al.)	Group Art Unit: 2161
)	
Application No.: 09/734,886)	Examiner: W. Amsbury
)	
Filed: December 13, 2000)	
)	
For: HYPERTEXT BROWSER)	
ASSISTANT)	

U.S. Patent and Trademark Office
Customer Window, Mail Stop **Appeal Brief - Patents**
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Alexandria, Virginia 22314

APPEAL BRIEF

This Appeal Brief is submitted in response to the Office Action, dated February 21, 2006, which re-opened prosecution in the present application, and in support of the Notice of Appeal, filed May 19, 2006.

I. **REAL PARTY IN INTEREST**

The real party in interest in this appeal is Google Inc.

II. RELATED APPEALS, INTERFERENCES, AND JUDICIAL PROCEEDINGS

Appellants are unaware of any related appeals, interferences or judicial proceedings.

III. STATUS OF CLAIMS

Claims 1-61 are pending in this application. Claims 1-61 were rejected in the Office Action, dated February 21, 2006, and are the subject of the present appeal. These claims are reproduced in the Claim Appendix of this Appeal Brief.

IV. STATUS OF AMENDMENTS

No Amendment has been filed subsequent to the Office Action, dated February 21, 2006.

V. SUMMARY OF CLAIMED SUBJECT MATTER

In the paragraphs that follow, each of the independent claims that is involved in this appeal and each dependent claim that is argued separately will be recited followed in parenthesis by examples of where support can be found in the specification and drawings.

Claim 1 recites a computer-implemented method for performing a search, comprising obtaining selection of one or more groups of characters in a document currently accessed by a user (620, Fig. 6; pg. 11, line 16, to pg. 12, line 5), the obtaining comprising highlighting the one or more groups of characters in the document (pg. 11, line 16, to pg. 12, line 3), and selecting a search object while the one or more groups of characters are highlighted in the document (pg. 12, lines 4-5, pg. 9, lines 3-16); generating a search query using the selected one or more groups of characters in response to selecting the search object (630, Fig. 6; pg. 13, lines 7-8); retrieving

search results based on the search query (pg. 13, lines 8-12); and presenting the search results to the user (660 and 670, Fig. 6; pg. 14, lines 3-6).

Claim 2 recites that the search object is located in at least one of a menu or toolbar (Fig. 4; pg. 9, lines 3-16).

Claim 3 recites that the obtaining selection includes receiving selection of a single group of characters in the document (pg. 11, lines 16-19).

Claim 4 recites that the generating a search query includes using the selected group of characters as a search term for the search query (pg. 13, lines 7-10).

Claim 5 recites that the obtaining selection includes receiving selection of a phrase in the document (pg. 11, lines 16-19).

Claim 6 recites that the generating a search query includes using the selected phrase as a single search term for the search query (pg. 13, lines 7-10).

Claim 7 recites that the generating a search query includes identifying words in the selected phrase, and creating the search query by combining the identified words (pg. 12, lines 8-13).

Claim 8 recites that the generating a search query further includes discarding those of the identified words from the search query that are unnecessary for obtaining relevant search results (pg. 12, lines 10-13).

Claim 10 recites that the generating a search query includes determining textual concepts in the selected paragraph, and creating the search query from the determined textual concepts (pg. 12, line 14, to pg. 13, line 3).

Claim 11 recites the determining textual concepts includes using one of a summarization

technique or a vector space model to identify the textual concepts (pg. 12, line 14, to pg. 13, line 3).

Claim 12 recites that the generating a search query includes using the selected paragraph as a search term for the search query (pg. 13, lines 2-3).

Claim 13 recites that the using the selected paragraph includes discarding stop words in the selected paragraph from the search query (pg. 13, lines 3-6).

Claim 14 recites that the obtaining selection includes receiving selection of the entire document (pg. 12, lines 14-15).

Claim 15 recites that the generating a search query includes determining textual concepts in the document, and generating the search query from the determined textual concepts (pg. 12, line 14, to pg. 13, line 3).

Claim 16 recites that the determining textual concepts includes using one of a summarization technique or a vector space model to identify the textual concepts (pg. 12, line 14, to pg. 13, line 3).

Claim 17 recites that the generating a search query includes using the selected document as a search term for the search query (pg. 13, lines 2-3).

Claim 20 recites a system for performing a search, comprising means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted (330, Fig. 3; pg. 11, line 16, to pg. 12, line 5); means for generating a search query using the selected one or more words (330, Fig. 3; pg. 13, lines 7-8); means for obtaining search results

based on the search query (330, Fig. 3; pg. 13, lines 8-12); and means for providing the search results to the user (330, Fig. 3; pg. 14, lines 3-6).

Claim 21 recites a system for facilitating performance of a search, comprising a browser configured to retrieve a document and present the document to a user (320, Fig. 3; pg. 11, lines 11-13); and a browser assistant configured to detect selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, generate a search query from the selected one or more groups of characters, retrieve search results based on the search query, and present the search results to the user (330, Fig. 3; pg. 11, line 16, to pg. 14, line 6).

Claim 22 recites a web browser embodied in a computer-readable medium, comprising instructions for identifying a document (610, Fig. 6; pg. 11, lines 5-15); instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted (620, Fig. 6; pg. 11, line 16, to pg. 12, line 5); instructions for generating a search query from the selected one or more groups of characters (630, Fig. 6; pg. 13, lines 7-8); instructions for obtaining search results based on the search query (660, Fig. 6; pg. 14, lines 3-6); and instructions for providing the search results (670, Fig. 6; pg. 14, lines 3-6).

Claim 23 recites a computer-readable medium that stores instructions executable by at least one processor to perform a method for executing a search, comprising instructions for detecting selection of one or more groups of characters in a document currently accessed by a

user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted (620, Fig. 6; pg. 11, line 16, to pg. 12, line 5); instructions for generating a search query using the selected one or more groups of characters (630, Fig. 6; pg. 13, lines 7-8); instructions for retrieving search results based on the search query (660, Fig. 6; pg. 14, lines 3-6); and instructions for presenting the search results to the user (670, Fig. 6; pg. 14, lines 3-6).

Claim 24 recites a method for performing a search in a network that includes a client and a server (Fig. 1), comprising obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted (110, Fig. 1; 620, Fig. 6; pg. 11, line 16, to pg. 12, line 5); generating, by the client, a search query using the selected one or more groups of characters (110, Fig. 1; 630, Fig. 6; pg. 13, lines 7-8); generating, by the server, search results based on the search query (120, Fig. 1; 650, Fig. 6; pg. 13, lines 11-12); obtaining, by the client, the search results from the server (110, Fig. 1; 660, Fig. 6; pg. 14, lines 3-6); and presenting, by the client, the search results to the user (110, Fig. 1; 670, Fig. 6; pg. 14, lines 3-6).

Claim 25 recites a method for prefetching documents associated with a search, comprising identifying a document that includes one or more links, each of the links corresponding to a linked document (820, Fig. 8; pg. 16, lines 16-19); analyzing each of the links in the document (820, Fig. 8; pg. 16, lines 16-19); determining a score for each of the links (pg. 17, line 7, to pg. 19, line 4); and prefetching a number of the linked documents corresponding to a number of the links based on the determined scores (840, Fig. 8; pg. 19, lines 5-10).

Claim 28 recites receiving selection of one of the links in the document (850, Fig. 8; pg. 19, lines 16-18); determining whether the selected link corresponds to one of the prefetched documents (pg. 19, lines 18-20); and providing the one prefetched document when the selected link corresponds to the one prefetched document (860, Fig. 8; pg. 19, lines 18-20).

Claim 29 recites retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents (pg. 19, line 20, to pg. 20, line 2).

Claim 31 recites that the prefetching includes using the address lookup to prefetch the linked documents corresponding to the number of the links (pg. 19, lines 9-10).

Claim 32 recites that the prefetching includes prefetching the linked documents corresponding to all of the links in the document (pg. 19, lines 13-15).

Claim 33 recites that the determining a score includes for each of the linked documents, determining scores for one or more linking documents that contain links to the linked document (pg. 17, lines 7-14), determining a score for each of the linked documents based on the scores of the one or more linking documents (pg. 17, lines 7-14), and associating the determined scores for the linked documents with the corresponding links (pg. 17, lines 7-14).

Claim 34 recites that the determining a score includes determining a clickthrough rate for each of the linked documents, determining a score for each of the linked documents based on the determined clickthrough rates, and associating the determined scores for the linked documents with the corresponding links (pg. 17, lines 15-19).

Claim 39 recites that the determining a score includes receiving input from a user, determining a score for each of the linked documents based on the received input, and

associating the determined scores for the linked documents with the corresponding links (pg. 18, lines 4-12).

Claim 40 recites that the determining a score for each of the linked documents includes for each of the linked documents, comparing one or more words of the received input with contents of the linked document, and determining a score for the linked document based on a degree of match between the one or more words and the contents of the linked document (pg. 18, lines 4-12).

Claim 41 recites that the prefetching includes retrieving the linked documents with scores of the corresponding links above a predetermined threshold (pg. 19, lines 6-8).

Claim 42 recites a system for prefetching documents associated with a search, comprising a browser configured to retrieve a document that includes one or more links, each of the links corresponding to a linked document (320, Fig. 3; pg. 16, lines 12-13); and a browser assistant configured to identify each of the links in the document, determine a score for each of the identified links, and prefetch a number of the linked documents corresponding to a number of the identified links based on the determined scores (330, Fig. 3; pg. 16, line 16, to pg. 19, line 10).

Claim 43 recites a web browser embodied in a computer-readable medium, comprising instructions for identifying a document that includes one or more links, each of the links corresponding to a linked document (810, Fig. 8; pg. 16, lines 12-13); instructions for identifying each of the links in the document (820, Fig. 8; pg. 16, lines 16-17); instructions for determining a score for each of the identified links (pg. 16, line 17, line 7, to pg. 19, line 4); and instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined scores (840, Fig. 8; pg. 19, lines 9-10).

Claim 44 recites a computer-readable medium that stores instructions executable by at least one processor to perform a method for prefetching documents associated with a search, comprising instructions for obtaining search results that include one or more links, each of the links corresponding to a linked document (810, Fig. 8; pg. 16, lines 12-13); instructions for analyzing each of the links (820, Fig. 8; pg. 16, lines 16-17); instructions for determining a score for each of the links (pg. 16, line 17, to pg. 19, line 4); and instructions for prefetching the linked documents corresponding to a number of the links based on the determined scores (840, Fig. 8; pg. 19, lines 9-10).

Claim 45 recites a method for prefetching documents associated with a search in a network that includes a client and a plurality of servers, comprising requesting, by the client, a document that includes one or more links, each of the links corresponding to a linked document (810, Fig. 8; pg. 16, lines 6-15); providing, by one of the servers, the requested document to the client (pg. 16, lines 8-11); analyzing, by the client, each of the links in the requested document (820, Fig. 8; pg. 16, lines 16-17); determining, by the client, a score for each of the links (pg. 16, line 17, to pg. 19, line 4); requesting, by the client, a number of the linked documents corresponding to a number of the links based on the determined scores (840, Fig. 8; pg. 19, lines 9-15); and providing, by one or more of the servers, the requested linked documents to the client (840, Fig. 8; pg. 19, lines 9-15).

Claim 46 recites a computer-implemented method for supplementing a document with links to related documents, comprising analyzing a document to identify one or more pieces of information (920, Fig. 9; pg. 20, lines 13-15); determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on

each of the identified pieces of information (930, Fig. 9; pg. 20, line 17, to pg. 21, line 10); and adding the links to the document (940, Fig. 9; pg. 21, line 17, to pg. 22, line 1).

Claim 47 recites that the pieces of information include at least one of a name, a product, a publication, or a key phrase (pg. 20, lines 13-15).

Claim 48 recites that when the pieces of information include one or more names, the determining a link includes for each of the names, identifying one or more related documents that include a link associated with the name, and determining one or more links corresponding to the identified documents (pg. 20, line 13, to pg. 21, line 16).

Claim 49 recites that when the pieces of information include information regarding one or more products, the determining a link includes for each of the products, identifying one or more related documents associated with at least one of a producer, a seller, or a review of the product, and determining one or more links corresponding to the identified documents (pg. 20, line 13, to pg. 21, line 16).

Claim 50 recites that when the pieces of information include information regarding one or more publications, the determining a link includes for each of the publications, identifying one or more related documents that include the publication, and determining one or more links corresponding to the identified documents (pg. 20, line 13, to pg. 21, line 16).

Claim 51 recites that when the pieces of information include one or more key phrases, the determining a link includes for each of the key phrases, identifying one or more related documents that include the key phrase, and determining one or more links corresponding to the identified documents (pg. 20, line 13, to pg. 21, line 16).

Claim 52 recites that wherein the determining a link includes sending each of the

identified pieces of information to a server, and receiving a link corresponding to each of the identified pieces of information from the server (pg. 21, lines 5-10).

Claim 54 recites that the adding the links includes modifying the document to include the links (pg. 21, line 17, to pg. 22, line 1).

Claim 55 recites that the adding the links includes providing a separate document that includes the links (pg. 22, lines 4-9).

Claim 56 recites a system for supplementing a document with links to related documents, comprising a browser configured to identify a document (320, Fig. 3; pg. 20, lines 5-13); and a browser assistant configured to analyze the document to identify one or more pieces of information, determine a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information, and provide the determined links with the document (330, Fig. 3; pg. 20, line 13, to pg. 21, line 16).

Claim 57 recites a web browser embodied in a computer-readable medium, comprising instructions for identifying a document (910, Fig. 9; pg. 20, lines 5-13); instructions for analyzing the document to identify one or more pieces of information (920, Fig. 9; pg. 20, lines 13-16); instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information (930, Fig. 9; pg. 20, line 17, to pg. 21, line 10); and instructions for presenting the document with the determined links to a user (950, Fig. 9; pg. 22, lines 1-9).

Claim 58 recites a computer-readable medium that stores instructions executable by at least one processor to perform a method for supplementing a document with links to related

documents, comprising instructions for identifying one or more pieces of information in the document (920, Fig. 9; pg. 20, lines 13-16); instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents using each of the identified pieces of information (930, Fig. 9; pg. 20, line 17, to pg. 21, line 10); and instructions for providing the determined links with the document (950, Fig. 9; pg. 22, lines 1-9).

Claim 59 recites a method for supplementing a document with links to related documents in a network that includes a client and a server, comprising requesting, by the client, a document (pg. 20, lines 5-10); providing, by the server, the requested document to the client (pg. 20, lines 5-13); analyzing, by the client, the requested document to identify one or more pieces of information (920, Fig. 9; pg. 20, lines 13-16); determining, by the client, a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information (930, Fig. 9; pg. 20, line 17, to pg. 21, line 10); and modifying, by the client, the requested document to include the links (940, Fig. 9; pg. 21, line 17, to pg. 22, line 1).

Claim 60 recites a hypertext browser assistant embodied in a computer-readable medium, comprising instructions for detecting selection of one or more words in a document currently accessed by a user (620, Fig. 6; pg. 12, lines 4-8); instructions for generating a search query using the selected one or more words (630, Fig. 6; pg. 13, lines 7-8); instructions for retrieving a document based on the search query (pg. 13, lines 11-17); instructions for identifying one or more pieces of information in the document (920, Fig. 9; pg. 20, lines 13-16); instructions for determining a link to a related document for each of the identified pieces of information by

performing a search of a set of documents based on each of the identified pieces of information (930, Fig. 9; pg. 20, line 17, to pg. 21, line 10); instructions for adding the links to the document (940, Fig. 9; pg. 21, line 17, to pg. 22, line 1); instructions for prefetching a number of the related documents corresponding to a number of the links (840, Fig. 8; pg. 19, lines 9-15); and instructions for presenting the document to the user (950, Fig. 9; pg. 22, lines 1-3).

Claim 61 recites a method for facilitating a search, comprising detecting selection of one or more words in a document currently accessed by a user (620, Fig. 6; pg. 12, lines 4-8); generating a search query using the selected one or more words (630, Fig. 6; pg. 13, lines 7-8); retrieving a document based on the search query, the document including one or more links corresponding to a linked document (pg. 13, lines 11-17); analyzing each of the links (820, Fig. 8; pg. 16, lines 16-19); prefetching a number of the linked documents corresponding to a number of the links (840, Fig. 8; pg. 19, lines 9-15); presenting the document to the user (pg. 19, lines 16-17); receiving selection of one of the links (850, Fig. 8; pg. 19, lines 16-18); retrieving the linked document corresponding to the selected link (860, Fig. 8; pg. 19, line 18, to pg. 20, line 2); identifying one or more pieces of information in the retrieved document (920, Fig. 9; pg. 20, lines 13-16); determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information (930, Fig. 9; pg. 20, line 17, to pg. 21, line 10); and providing the determined links with the related document to the user (950, Fig. 9; pg. 22, lines 1-9).

VI. GROUND OF REJECTION TO BE REVIEWED ON APPEAL

A. Claims 1-6 and 9-24 stand rejected under 35 U.S.C. § 112, first paragraph, as not

complying with the enablement requirement.

B. Claims 1-6 and 9-24 stand rejected under 35 U.S.C. § 112, second paragraph, as indefinite.

C. Claims 1-6 and 9-24 stand rejected under 35 U.S.C. § 112, second paragraph, as incomplete for omitting essential structural cooperative relationships of elements.

D. Claims 1, 3-7, 9-12, 14-33, and 35-45 stand rejected under 35 U.S.C. § 102(e) as anticipated by Kleinberg (U.S. Patent No. 6,112,202).

E. Claims 2, 8, 13, 34, and 46-61 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Kleinberg (U.S. Patent No. 6,112,202).

VII. ARGUMENTS

A. The rejection under 35 U.S.C. § 112, first paragraph, should be reconsidered and withdrawn.

1. Claims 1-6 and 9-24.

Claim 1 recites a computer-implemented method for performing a search, comprising obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining comprises highlighting the one or more groups of characters in the document, and selecting a search object while the one or more groups of characters are highlighted in the document; generating a search query using the selected one or more groups of characters in response to selecting the search object; retrieving search results based on the search query; and presenting the search results to the user. With respect to this claim, the Office Action alleges that:

[t]he phrase: "search object" is not defined in the specification, and its relationship to highlighted characters is not set forth in an enabling manner. In the Brief, page 14 top, it is stated that the search object may or may not be dependent on the highlighted characters (of the claims), which leaves it to be anything.

Reference is made to page 12 of the Specification, where it is stated that a user may select a software button or menu item provided, perhaps, by a browser assistant. The term search object is not used in this discussion, and thus the connection of a browser assistant and/or buttons and menus to such a term is not made. Furthermore, these terms do not appear in the claims.

Claim 2 states that the search object may be located in a menu or toolbar, but does not explicate what it is per se, and the claim is not part of the Specification.

In summary, there is no viable guidance in the Specification to enable one skilled in the art to make and/or use the invention as claimed using this phrase.

(Office Action, pp. 2-3). Appellants respectfully disagree with the Office Action's allegations.

One embodiment of Appellants' invention is described in relation to the process depicted in Fig. 6 (see, for example, pages 11-16 of Appellants' Specification). In this exemplary process, a user may activate web browser software, such as browser 320 (Fig. 3), on a client, such as client 110 (Fig. 1) (Specification, pg. 11). The user may then provide an address, such as a Uniform Resource Locator (URL), of a document to the browser 320 or a query that the browser 320 may use to obtain one or more documents using a hierarchical directory or search engine, such as the search engine 125 maintained by the server 120 (Specification, pg. 11). The browser 320 may use the address or query to obtain a document maintained by a server, such as server 130, in the network 140 [act 610] (Specification, pg. 11). The browser 320 may then display the document to the user (Specification, pg. 11). According to this embodiment, the user may perform a search without having to leave the document currently displayed by the browser 320.

To perform a search, the user may select a word, phrase, or paragraph in the document or select the entire document for a search by, for example, clicking on the word, positioning a pointer, such as a cursor, over the word, or highlighting the word; highlighting the words forming

the phrase or paragraph; or selecting a software button or menu item provided, for example, by the browser assistant 330 to select the entire document (Specification, pp. 11-12). The browser assistant 330 may detect the selection by the user, automatically or in response to an action by the user [act 620] (Specification, pg. 12) (emphasis added).

As set forth on pages 8-9 of Appellants' Specification, browser assistant 330 may be implemented in a number of different ways. For example, Appellants' Fig. 4 shows three forms in which the browser assistant 330 may be implemented – as a toolbar 410, a software button 420, and a menu 430. As set forth on page 9 of Appellants' Specification, a user may invoke functionality of browser assistant 330 via toolbar 410, software button 420, or menu 430 (e.g., a user may select a function from a list of functions associated with menu 430) (Specification, pg. 9). Thus, browser assistant 330 may detect selection of a word, a phrase, a paragraph, or an entire document in response to the user invoking functionality of browser assistant 330.

The browser assistant 330 may generate a search query based on one or more search terms from the selected word, phrase, paragraph, or document [act 630] (Specification, pg. 13). The browser assistant 330 may generate a request to query the search engine 125 using the search query and send the request to the search engine 125 [act 640] (Specification, pg. 13).

In response to the request, the search engine 125 may generate data that contains the search results and send the search results to the browser assistant 330 [act 650], which may in turn present the results to the user [act 670] (Specification, pg. 13).

Appellants submit that the features recited in claim 1 correspond to the above description. For example, as set forth above, claim 1 recites, *inter alia*, obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining comprises

highlighting the one or more groups of characters in the document, and selecting a search object while the one or more groups of characters are highlighted in the document. Appellants submit that it is quite clear that the search object corresponds to, for example, a toolbar object, a software button, or a menu item. For example, as described above and clearly enabled by Appellants' Specification, a user may perform a search for a word in a document that is currently being presented to the user by highlighting the word in the document and then selecting a toolbar object, a software button, or a menu item (recited as a search object in claim 1), while the word is highlighted in the document, to cause the word to be selected by the browser assistant for performing a search.

Appellants submit that the phrase "search object" is clear based on Appellants' Specification. Moreover, as set forth above, Appellants submit that the features recited in claim 1 are described in Appellants' Specification in such a way as to enable one skilled in the art to make and use the invention. Thus, claim 1 satisfies the enablement requirement of 35 U.S.C. § 112, first paragraph.

For at least the foregoing reasons, Appellants respectfully request that the rejection of claim 1 under 35 U.S.C. § 112, first paragraph, be reconsidered and withdrawn.

Claims 2-6 and 9-19 depend from claim 1. Therefore, Appellants respectfully request that the rejection of claim 1 under 35 U.S.C. § 112, first paragraph, be reconsidered and withdrawn for at least the reasons given above with respect to claim 1.

Independent claims 20-24 recite features similar to (yet possibly of different scope than) features described above with respect to claim 1. Therefore, Appellants respectfully request that the rejection of claims 20-24 under 35 U.S.C. § 112, first paragraph, be reconsidered and

withdrawn for at least reasons similar to reasons given above with respect to claim 1.

B. The rejection under 35 U.S.C. § 112, second paragraph, as indefinite should be reconsidered and withdrawn.

1. Claims 1-6 and 9-24.

Claim 1 recites a computer-implemented method for performing a search, comprising obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining comprises highlighting the one or more groups of characters in the document, and selecting a search object while the one or more groups of characters are highlighted in the document; generating a search query using the selected one or more groups of characters in response to selecting the search object; retrieving search results based on the search query; and presenting the search results to the user. With respect to this claim, the Office Action alleges that:

[i]t is not clear what is meant by search object in these claims, since it is not a term in the art and is not defined in the Specification. In the interest of compact prosecution, it is taken to mean any entity that might be used to initiate a search and/or any entity that might be the target object of a search, as needed.

(Office Action, pg. 3). Appellants respectfully disagree with the Office Action's allegation.

One embodiment of Appellants' invention is described in relation to the process depicted in Fig. 6 (see, for example, pages 11-16 of Appellants' Specification). In this exemplary process, a user may activate web browser software, such as browser 320 (Fig. 3), on a client, such as client 110 (Fig. 1) (Specification, pg. 11). The user may then provide an address, such as a Uniform Resource Locator (URL), of a document to the browser 320 or a query that the browser 320 may use to obtain one or more documents using a hierarchical directory or search engine,

such as the search engine 125 maintained by the server 120 (Specification, pg. 11). The browser 320 may use the address or query to obtain a document maintained by a server, such as server 130, in the network 140 [act 610] (Specification, pg. 11). The browser 320 may then display the document to the user (Specification, pg. 11). According to this embodiment, the user may perform a search without having to leave the document currently displayed by the browser 320.

To perform a search, the user may select a word, phrase, or paragraph in the document or select the entire document for a search by, for example, clicking on the word, positioning a pointer, such as a cursor, over the word, or highlighting the word; highlighting the words forming the phrase or paragraph; or selecting a software button or menu item provided, for example, by the browser assistant 330 to select the entire document (Specification, pp. 11-12). The browser assistant 330 may detect the selection by the user, automatically or in response to an action by the user [act 620] (Specification, pg. 12) (emphasis added).

As set forth on pages 8-9 of Appellants' Specification, browser assistant 330 may be implemented in a number of different ways. For example, Appellants' Fig. 4 shows three forms in which the browser assistant 330 may be implemented – as a toolbar 410, a software button 420, and a menu 430. As set forth on page 9 of Appellants' Specification, a user may invoke functionality of browser assistant 330 via toolbar 410, software button 420, or menu 430 (e.g., a user may select a function from a list of functions associated with menu 430) (Specification, pg. 9). Thus, browser assistant 330 may detect selection of a word, a phrase, a paragraph, or an entire document in response to the user invoking functionality of browser assistant 330.

The browser assistant 330 may generate a search query based on one or more search terms from the selected word, phrase, paragraph, or document [act 630] (Specification, pg. 13).

The browser assistant 330 may generate a request to query the search engine 125 using the search query and send the request to the search engine 125 [act 640] (Specification, pg. 13).

In response to the request, the search engine 125 may generate data that contains the search results and send the search results to the browser assistant 330 [act 650], which may in turn present the results to the user [act 670] (Specification, pg. 13).

Appellants submit that the features recited in claim 1 correspond to the above description. For example, as set forth above, claim 1 recites, *inter alia*, obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining comprises highlighting the one or more groups of characters in the document, and selecting a search object while the one or more groups of characters are highlighted in the document. Appellants submit that it is quite clear that the search object corresponds to, for example, a toolbar object, a software button, or a menu item. For example, as described above and clearly supported by Appellants' Specification, a user may perform a search for a word in a document that is currently being presented to the user by highlighting the word in the document and then selecting a toolbar object, a software button, or a menu item (recited as a search object in claim 1), while the word is highlighted in the document, to cause the word to be selected by the browser assistant for performing a search.

Appellants submit that the phrase "search object" is clear, when that phrase is properly interpreted in light of Appellants' Specification.

For at least the foregoing reasons, Appellants respectfully request that the rejection of claim 1 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn.

Claims 2-6 and 9-19 depend from claim 1. Therefore, Appellants respectfully request

that the rejection of claims 2-6 and 9-19 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn for at least the reasons given above with respect to claim 1.

Independent claims 20-24 recite features similar to (yet possibly of different scope than) features described above with respect to claim 1. Therefore, Appellants respectfully request that the rejection of claims 20-24 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn for at least reasons similar to reasons given above with respect to claim 1.

C. The rejection under 35 U.S.C. § 112, second paragraph, as being incomplete should be reconsidered and withdrawn.

1. Claims 1-6 and 9-24.

Claim 1 recites a computer-implemented method for performing a search, comprising obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining comprises highlighting the one or more groups of characters in the document, and selecting a search object while the one or more groups of characters are highlighted in the document; generating a search query using the selected one or more groups of characters in response to selecting the search object; retrieving search results based on the search query; and presenting the search results to the user. With respect to this claim, the Office Action alleges that:

[t]he omitted structural cooperative relationships are: any relationship between search object and the highlighted groups of characters. As noted above, the Brief states that there may not be any, and in that case the role of the search object in the claims is unexplained, simply one of a list of unconnected elements.

(Office Action, pg. 4). Appellants respectfully disagree with the Office Action's allegations.

One embodiment of Appellants' invention is described in relation to the process depicted

in Fig. 6 (see, for example, pages 11-16 of Appellants' Specification). In this exemplary process, a user may activate web browser software, such as browser 320 (Fig. 3), on a client, such as client 110 (Fig. 1) (Specification, pg. 11). The user may then provide an address, such as a Uniform Resource Locator (URL), of a document to the browser 320 or a query that the browser 320 may use to obtain one or more documents using a hierarchical directory or search engine, such as the search engine 125 maintained by the server 120 (Specification, pg. 11). The browser 320 may use the address or query to obtain a document maintained by a server, such as server 130, in the network 140 [act 610] (Specification, pg. 11). The browser 320 may then display the document to the user (Specification, pg. 11). According to this embodiment, the user may perform a search without having to leave the document currently displayed by the browser 320.

To perform a search, the user may select a word, phrase, or paragraph in the document or select the entire document for a search by, for example, clicking on the word, positioning a pointer, such as a cursor, over the word, or highlighting the word; highlighting the words forming the phrase or paragraph; or selecting a software button or menu item provided, for example, by the browser assistant 330 to select the entire document (Specification, pp. 11-12). The browser assistant 330 may detect the selection by the user, automatically or in response to an action by the user [act 620] (Specification, pg. 12) (emphasis added).

As set forth on pages 8-9 of Appellants' Specification, browser assistant 330 may be implemented in a number of different ways. For example, Appellants' Fig. 4 shows three forms in which the browser assistant 330 may be implemented – as a toolbar 410, a software button 420, and a menu 430. As set forth on page 9 of Appellants' Specification, a user may invoke functionality of browser assistant 330 via toolbar 410, software button 420, or menu 430 (e.g., a

user may select a function from a list of functions associated with menu 430) (Specification, pg. 9). Thus, browser assistant 330 may detect selection of a word, a phrase, a paragraph, or an entire document in response to the user invoking functionality of browser assistant 330.

The browser assistant 330 may generate a search query based on one or more search terms from the selected word, phrase, paragraph, or document [act 630] (Specification, pg. 13). The browser assistant 330 may generate a request to query the search engine 125 using the search query and send the request to the search engine 125 [act 640] (Specification, pg. 13).

In response to the request, the search engine 125 may generate data that contains the search results and send the search results to the browser assistant 330 [act 650], which may in turn present the results to the user [act 670] (Specification, pg. 13).

Appellants submit that a structural cooperative relationship may or may not exist between the highlighted one or more groups of characters and the search object. A relationship does exist, however, between the highlighted one or more groups of characters and the search object in that the highlighted one or more groups of characters and the search object may be presented to the user at the same time. For example, the highlighted one or more groups of characters may be provided to the user in a document display area while the search object may be provided in a tool bar or a menu, or as a software button. Appellants submit that the relationship between the highlighted one or more groups of characters and the search object is clear, when claim 1 is viewed in light of Appellants' Specification. Moreover, Appellants submit that the above relationship is also clear from the language of claim 1 itself. That is, the above relationship between the highlighted one or more groups of characters and the search object is clear since claim 1 specifically recites selecting the search object while the one or more groups of characters

are highlighted in the document.

For at least the foregoing reasons, Appellants respectfully request that the rejection of claim 1 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn.

Claims 2-6 and 9-19 depend from claim 1. Therefore, Appellants respectfully request that the rejection of claim 2-6 and 9-19 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn for at least the reasons given above with respect to claim 1.

Independent claims 20-24 recite features similar to (yet possibly of different scope than) features described above with respect to claim 1. Therefore, Appellants respectfully request that the rejection of claims 20-24 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn for at least reasons similar to reasons given above with respect to claim 1.

D. The rejection under 35 U.S.C. § 102(e) based on Kleinberg (U.S. Patent No. 6,112,202) should be reversed.

The initial burden of establishing a *prima facie* basis to deny patentability to a claimed invention always rests upon the Examiner. In re Oetiker, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 2 USPQ2d 1051 (Fed. Cir. 1987).

1. Claims 1, 9, 18, and 19.

Independent claim 1 is directed to a computer-implemented method for performing a search. The method includes obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document; generating a search query using the selected one or more groups of characters in response to selecting the search object; retrieving search results based on the search query; and presenting the search results to the user. Kleinberg does not disclose or suggest the combination of features recited in claim 1.

For example, Kleinberg does not disclose or suggest obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document. With respect to these features, the Office Action alleges:

One object of Kleinberg is to search for resources such as Web pages that are linked with hyperlinks [COL 4 lines 11-16]. Kleinberg is an improvement on the background technology in which hyperlinks may be highlighted [COL 2 line 49 to COL 3 line 4]. A set of highlighted words, pictures or icons associated with hyperlinks corresponds to a search object that initiates a search [COL 2 lines 51-56]. So does a hyperlink embedded in a displayed and/or highlighted item such as a word, phrase, icon or picture [COL 1 lines 61-67]

(Office Action, pg. 5). Appellants submit that the Office Action has mischaracterized the above features of claim 1.

Claim 1 does not recite clicking on a hyperlink in a document. Instead, claim 1 clearly and specifically recites obtaining selection of one or more groups of characters in a document

currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document. Selection of a hyperlink in a document in no way relates to obtaining selection of one or more groups of characters in a document by highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document.

At col. 4, lines 11-16, Kleinberg discloses:

It is a further object of the invention to find, from among a collection of information resources such as Web pages, where content-based links (e.g., hyperlinks) exist between different information resources, a set of information resources which are, in a sense, "authoritative" as to a particular subject.

This section of Kleinberg discloses finding a set of information resources that are authoritative to a particular subject. This section of Kleinberg in no way discloses or suggests obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1.

At col. 2, line 49, to col. 3, line 4, Kleinberg discloses:

To this point the Web has been used in industry predominately as a means of communication, advertisement, and placement of orders. The Web facilitates user access to information resources by letting the user jump from one Web page, or from one server, to another, simply by selecting a highlighted word, picture or icon (a program object representation) about which the user wants more information. The programming construct which makes this maneuver possible is known as a "hyperlink".

In order to explore the Web today, the user loads a special navigation program, called a "Web browser" onto his computer. A browser is a program which is particularly tailored for facilitating user requests for Web pages by implementing

hyperlinks in a graphical environment. If a word or phrase, appearing on a Web page, is configured as an hyperlink to another Web page, the word or phrase is typically given in a color which contrasts with the surrounding text or background, underlined, or otherwise highlighted. Accordingly, the word or phrase defines a region, on the graphical representation of the Web page, inside of which a mouse click will activate the hyperlink, request a download of the linked-to page, and display the page when it is downloaded.

This section of Kleinberg corresponds to the background section of Kleinberg. This section of Kleinberg discloses that a hyperlink may be highlighted in a web page and that a mouse click will activate the hyperlink. This section of Kleinberg in no way discloses or suggests obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as equivalent to obtaining selection of one or more groups of characters, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1.

At col. 1, lines 61-67, Kleinberg discloses:

Hyperlink: A network addressing tool embedded in a user-understandable displayed and/or highlighted item, such as a word, phrase, icon or picture. A URL can be accessed by means of its corresponding Hyperlink. When a user on a client machine selects the highlighted hyperlink through the user interface, the underlying item is then retrieved to the client supporting a Web browser.

This section of Kleinberg defines the term hyperlink. This section of Kleinberg in no way discloses or suggests obtaining selection of one or more groups of characters in a document

currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as equivalent to obtaining selection of one or more groups of characters, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1.

Since Kleinberg does not disclose or suggest obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, Kleinberg cannot disclose or suggest generating a search query using the selected one or more groups of characters in response to selecting the search object, as also required by claim 1. The Office Action alleges that "[c]licking on such a highlighted hyperlink corresponds to generating a search query for at least one page" and points to col. 4, lines 44-52, and col. 7, lines 27-30, of Kleinberg for support (Office Action, pg. 5). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Contrary to the allegation in the Office Action, Appellants submit that clicking a hyperlink to retrieve a document with which the hyperlink is associated is not the same as generating a search query using the selected one or more groups of characters in response to selecting the search object, as required by claim 1. As correctly described by Kleinberg, when a

user selects a hyperlink, the underlying item (e.g., the document with which the hyperlink is associated) is retrieved (see, for example, col. 1, lines 64-67). Retrieving a document in response to a hyperlink being selected does not involve and is not the same as generating a search query.

Kleinberg does not support the Office Action's allegation that these two different acts are equivalent and the Office Action does not point to any document that supports this allegation.

At col. 4, lines 44-52, Kleinberg discloses:

First, an initial set of pages is obtained. The method may begin with a single page, where the content of that page is of interest, or with a group of pages, for instance produced as a result of a keyword-based query by a Web search engine. Because of the content-based links (e.g., hyperlinks) between the pages, there will be a certain number of additional pages linked to or from the single page, or group of pages. The initial set, then, includes the single page or group of pages, plus the linked pages.

This section of Kleinberg discloses a search may result in a page or group of pages and that this page (or group of pages) may include hyperlinks to other pages. This section of Kleinberg in no way discloses or suggests generating a search query using the selected one or more groups of characters in response to selecting the search object, as required by claim 1. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query. In fact, this section of Kleinberg does not even mention selecting a hyperlink.

At col. 7, lines 27-30, Kleinberg discloses:

For instance, if the user knows of one page with subject matter of interest, and seeks to find authoritative pages as to that subject matter, the initial set may be obtained merely by finding other pages linked to or from that page.

This section of Kleinberg discloses that a page with subject matter of interest to a user may be supplemented with other pages linked to or from that page. This section of Kleinberg in no way

discloses or suggests generating a search query using the selected one or more groups of characters in response to selecting the search object, as required by claim 1. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query.

For at least the foregoing reasons, Appellants submit that the rejection of claim 1 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 1 be reversed.

Claims 9, 18, and 19 depend from claim 1. Therefore, Appellants request that the rejection of claims 9, 18, and 19 be reversed for at least the reasons given above with respect to claim 1.

2. Claim 3.

Claim 3 depends from claim 1. Therefore, claim 3 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 1. Moreover, claim 3 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 3 recites that the obtaining selection includes receiving selection of a single group of characters in the document. Kleinberg does not disclose or suggest this feature. The Office Action does not address the feature recited in claim 3. Accordingly, a proper case of anticipation has not been established with respect to claim 3. Moreover, since Kleinberg does not disclose or suggest obtaining selection of one or more groups of characters in a document currently accessed by a user, Kleinberg cannot disclose or suggest the above feature of claim 3.

For at least the foregoing reasons, Appellants submit that the rejection of claim 3 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the

rejection of claim 3 be reversed.

3. Claim 4.

Claim 4 depends from claim 3. Therefore, claim 4 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 3. Moreover, claim 4 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 4 recites that the generating a search query includes using the selected group of characters as a search term for the search query. Kleinberg does not disclose or suggest this feature. The Office Action does not address the feature recited in claim 4. Accordingly, a proper case of anticipation has not been established with respect to claim 4.

For at least the foregoing reasons, Appellants submit that the rejection of claim 4 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 4 be reversed.

4. Claim 5.

Claim 5 depends from claim 1. Therefore, claim 5 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 1. Moreover, claim 5 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 5 recites that the obtaining selection includes receiving selection of a phrase in the document. The Office Action alleges that "Kleinberg is an improvement on the practice of using phrases as hyperlinks" and points to col. 1, lines 38 and 63, and col. 2, line 64, of Kleinberg for support (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants submit that the Office Action's allegation that Kleinberg is an

improvement on the practice of using phrases as hyperlinks does not address the above feature of claim 5. That is, claim 5 does not recite using phrases as hyperlinks. Instead, claim 5 specifically recites that obtaining selection of one or more groups of characters in a document currently accessed by a user includes receiving selection of a phrase in the document. The Office Action does not address this feature of claim 5. Thus, a proper case of anticipation has not been established with respect to claim 5.

At col. 1, lines 38 and 63, and col. 2, line 64, Kleinberg discloses:

database by clicking on highlighted words or phrases of
as a word, phrase, icon or picture. A URL can be accessed
another Web page, the word or phrase is typically given in.

These sections of Kleinberg indicate that a phrase can be used as a hyperlink. These sections of Kleinberg do not disclose or suggest that obtaining selection of one or more groups of characters in a document currently accessed by a user includes receiving selection of a phrase in the document, as required by claim 5.

For at least the foregoing reasons, Appellants submit that the rejection of claim 5 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 5 be reversed.

5. Claim 6.

Claim 6 depends from claim 5. Therefore, claim 6 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 5. Moreover, claim 6 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 6 recites that the generating a search query includes using the selected phrase as a

single search term for the search query. With respect to this feature, the Office Action alleges that "Kleinberg is an improvement on the practice of using phrases as hyperlinks" and points to col. 1, lines 38 and 63, and col. 2, line 64, of Kleinberg for support (Office Action, pg. 6).

Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants submit that the Office Action's allegation that Kleinberg is an improvement on the practice of using phrases as hyperlinks does not address the above feature of claim 6. That is, claim 6 does not recite using phrases as hyperlinks. Instead, claim 6 specifically recites that the generating a search query includes using the selected phrase as a single search term for the search query. The Office Action does not address this feature of claim 6. Thus, a proper case of anticipation has not been established with respect to claim 6.

Col. 1, lines 38 and 63, and col. 2, line 64, of Kleinberg is reproduced above. These sections of Kleinberg indicate that a phrase can be used as a hyperlink. These sections of Kleinberg do not disclose or suggest that the generating a search query includes using the selected phrase as a single search term for the search query, as required by claim 6.

As indicated above with respect to claim 1, Appellants submit that selecting a hyperlink does not involve and is not equivalent to generating a search query. Kleinberg does not disclose or suggest using the phrase that is displayed in a document as a hyperlink as a single search term for a search query, as required by the Office Action's interpretation of claim 6. Kleinberg specifically discloses that a hyperlink can be used to access a URL of a document. Kleinberg does not disclose or suggest that accessing the URL of a document via a hyperlink involves or is equivalent to using the hyperlink as a single search term for a search query, as required by the Office Action's interpretation of claim 6. The Office Action does not point to any section of

Kleinberg (or elsewhere) that supports the Office Action's allegation that these acts are equivalent.

For at least the foregoing reasons, Appellants submit that the rejection of claim 6 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 6 be reversed.

6. Claim 7.

Claim 7 depends from claim 5. Therefore, claim 7 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 5. Moreover, claim 7 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 7 recites that the generating a search query includes identifying words in the selected phrase and creating the search query by combining the identified words. With respect to these features, the Office Action alleges that "Kleinberg is an improvement on the practice of using phrases as hyperlinks" and points to col. 1, lines 38 and 63, and col. 2, line 64, of Kleinberg for support (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants submit that the Office Action's allegation that Kleinberg is an improvement on the practice of using phrases as hyperlinks does not address the above features of claim 7. That is, claim 7 does not recite using phrases as hyperlinks. Instead, claim 7 specifically recites that the generating a search query includes identifying words in the selected phrase and creating the search query by combining the identified words. The Office Action does not address the features of claim 7. Thus, a proper case of anticipation has not been established with respect to claim 7.

Col. 1, lines 38 and 63, and col. 2, line 64, of Kleinberg is reproduced above. These sections of Kleinberg indicate that a phrase can be used as a hyperlink. These sections of Kleinberg do not disclose or suggest that the generating a search query includes identifying words in the selected phrase and creating the search query by combining the identified words, as required by claim 7.

As indicated above with respect to claim 1, Appellants submit that selecting a hyperlink does not involve and is not equivalent to generating a search query. Kleinberg does not disclose or suggest identifying words in a phrase that is displayed in a document as a hyperlink and creating a search query by combining the identified words, as would be required by the Office Action's interpretation of claim 7.

For at least the foregoing reasons, Appellants submit that the rejection of claim 7 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 7 be reversed.

7. Claim 10.

Claim 10 depends indirectly from claim 1. Therefore, claim 10 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 1. Moreover, claim 10 recites additional features not disclosed or suggested by Kleinberg.

Claim 10 recites that the generating a search query includes determining textual concepts in a selected paragraph and creating a search query from the determined textual concepts. With respect to these features, the Office Action alleges that "words and phrases correspond to textual concepts" (Office Action, pg. 6). Appellants submit that this allegation in the Office Action does not address the above features of claim 10. That is, claim 10 does not merely recite that words

and phrases correspond to textual concepts. Instead, claim 10 specifically recites that the generating a search query includes determining textual concepts in a selected paragraph and creating a search query from the determined textual concepts. Kleinberg in no way discloses or suggests these features. Moreover, the Office Action does not address the features of claim 10. Thus, a proper case of anticipation has not been established with respect to claim 10.

For at least the foregoing reasons, Appellants submit that the rejection of claim 10 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 10 be reversed.

8. Claim 11.

Claim 11 depends from claim 10. Therefore, claim 11 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 10. Moreover, claim 11 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 11 recites that the determining textual concepts in a selected paragraph includes using one of a summarization technique or a vector space model to identify the textual concepts. With respect to this feature, the Office Action alleges that "Kleinberg applies a vector space model" and points to col. 8, line 43 and after of Kleinberg for support (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants submit that the Office Action's allegation that Kleinberg applies a vector space model does not address the above feature of claim 11. That is, claim 11 does not merely recite applying a vector space model. Instead, claim 11 specifically recites that the determining textual concepts in a selected paragraph includes using one of a summarization technique or a vector space model to identify the textual concepts. The Office Action does not

address the feature of claim 11. Thus, a proper case of anticipation has not been established with respect to claim 11.

At col. 8, line 43, et seq., Kleinberg discloses defining hub and authority vectors H and A, where each term in each vector corresponds to one of the pages in the set of pages that either point to a page or are pointed to by a page in the set. Assuming that the hub and authority vectors H and A can reasonably be considered as vector space models (a point that Appellants do not concede), Kleinberg does not disclose or suggest using the hub and authority vectors H and A to identify textual concepts in a selected paragraph, as would be required by the Office Action's interpretation of claim 11. Thus, regardless of the accuracy of the Office Action's allegation that Kleinberg discloses applying a vector space model, Kleinberg does not disclose or suggest that a vector space model is used to identify textual concepts of a selected paragraph, as required by claim 11.

For at least the foregoing reasons, Appellants submit that the rejection of claim 11 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 11 be reversed.

9. Claim 12.

Claim 12 depends indirectly from claim 1. Therefore, claim 12 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 1. Moreover, claim 12 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 12 recites that the generating a search query includes using the selected paragraph as a search term for the search query. The Office Action does not address this feature.

Accordingly, a proper case of anticipation has not been established with respect to claim 12.

For at least the foregoing reasons, Appellants submit that the rejection of claim 12 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 12 be reversed.

10. Claim 14.

Claim 14 depends from claim 1. Therefore, claim 14 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 1. Moreover, claim 14 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 14 recites that the obtaining selection of one or more groups of characters in a document includes receiving selection of the entire document. The Office Action does not address this feature. Accordingly, a proper case of anticipation has not been established with respect to claim 14.

Appellants note that with respect to claim 9, the Office Action alleges that "[a] phrase may be an entire document" (Office Action, pg. 6). Appellants respectfully submit that Kleinberg does not disclose or suggest a document that includes only a single hyperlink, on which the Office Action relies as corresponding to a phrase. The Office Action does not point to any section of Kleinberg that discloses receiving selection of an entire document, where the document includes only a single hyperlink, as required by the Office Action's apparent interpretation of claim 14.

For at least the foregoing reasons, Appellants submit that the rejection of claim 14 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 14 be reversed.

11. Claim 15.

Claim 15 depends from claim 14. Therefore, claim 15 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 14. Moreover, claim 15 recites additional features not disclosed or suggested by Kleinberg.

Claim 15 recites that the generating a search query includes determining textual concepts in the document and generating the search query from the determined textual concepts. The Office Action does not address these features. Accordingly, a proper case of anticipation has not been established with respect to claim 15.

Appellants note that with respect to claim 9, the Office Action alleges that "[a] phrase may be an entire document" (Office Action, pg. 6). With respect to claim 10, which recites that the generating a search query includes determining textual concepts in a selected paragraph and creating a search query from the determined textual concepts, the Office Action alleges that "words and phrases correspond to textual concepts" (Office Action, pg. 6). Appellants submit that this allegation in the Office Action does not address the above features of claim 15. That is, claim 15 does not merely recite that words and phrases correspond to textual concepts. Instead, claim 15 specifically recites that the generating a search query includes determining textual concepts in the document and generating the search query from the determined textual concepts. Kleinberg in no way discloses or suggests these features. Moreover, the Office Action does not address the features of claim 15. Thus, a proper case of anticipation has not been established with respect to claim 15.

For at least the foregoing reasons, Appellants submit that the rejection of claim 15 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 15 be reversed.

12. Claim 16.

Claim 16 depends from claim 15. Therefore, claim 16 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 15. Moreover, claim 16 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 16 recites that the determining textual concepts in a selected paragraph includes using one of a summarization technique or a vector space model to identify the textual concepts. With respect to this feature, the Office Action alleges that "Kleinberg applies a vector space model" and points to col. 8, line 43 and after of Kleinberg for support (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants submit that the Office Action's allegation that Kleinberg applies a vector space model does not address the above feature of claim 16. That is, claim 16 does not merely recite applying a vector space model. Instead, claim 16 specifically recites that the determining textual concepts in a document includes using one of a summarization technique or a vector space model to identify the textual concepts. Moreover, the Office Action does not address the above feature of claim 16. Thus, a proper case of anticipation has not been established with respect to claim 16.

At col. 8, line 43, et seq., Kleinberg discloses defining hub and authority vectors H and A, where each term in each vector corresponds to one of the pages in the set of pages that either point to a page or are pointed to by a page in the set. Assuming that the hub and authority vectors H and A can reasonably be considered as vector space models (a point that Appellants do not concede), Kleinberg does not disclose or suggest using the hub and authority vectors H and A to identify textual concepts in a document, as would be required by the Office Action's

interpretation of claim 16. Thus, regardless of the accuracy of the Office Action's allegation that Kleinberg discloses applying a vector space model, Kleinberg does not disclose or suggest that a vector space model is used to identify textual concepts of a document, as required by claim 16.

For at least the foregoing reasons, Appellants submit that the rejection of claim 16 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 16 be reversed.

13. Claim 17.

Claim 17 depends from claim 14. Therefore, claim 17 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 14. Moreover, claim 17 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 17 recites that the generating a search query includes using the selected document as a search term for the search query. The Office Action does not address this feature.

Accordingly, a proper case of anticipation has not been established with respect to claim 17.

For at least the foregoing reasons, Appellants submit that the rejection of claim 17 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 17 be reversed.

14. Claim 20.

Independent claim 20 is directed to a system for performing a search. The system includes means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted; means for generating a search query using the selected one or

more words; means for obtaining search results based on the search query; and means for providing the search results to the user. Kleinberg does not disclose or suggest the combination of features recited in claim 20.

For example, Kleinberg does not disclose or suggest means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. With respect to these features, the Office Action alleges:

One object of Kleinberg is to search for resources such as Web pages that are linked with hyperlinks [COL 4 lines 11-16]. Kleinberg is an improvement on the background technology in which hyperlinks may be highlighted [COL 2 line 49 to COL 3 line 4]. A set of highlighted words, pictures or icons associated with hyperlinks corresponds to a search object that initiates a search [COL 2 lines 51-56]. So does a hyperlink embedded in a displayed and/or highlighted item such as a word, phrase, icon or picture [COL 1 lines 61-67]

(Office Action, pg. 5). Appellants submit that the Office Action has mischaracterized the above features of claim 20.

Claim 20 does not recite clicking on a hyperlink in a document. Instead, claim 20 clearly and specifically recites means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. Selection of a hyperlink in a document in no way relates to means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters

in the document are highlighted, as required by claim 20.

Col. 4, lines 11-16, of Kleinberg is reproduced above. This section of Kleinberg discloses finding a set of information resources that are authoritative to a particular subject. This section of Kleinberg in no way discloses or suggests means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 20.

Col. 2, line 49, to col. 3, line 4, of Kleinberg is reproduced above. This section of Kleinberg corresponds to the background section of Kleinberg. This section of Kleinberg discloses that a hyperlink may be highlighted in a web page and that a mouse click will activate the hyperlink. This section of Kleinberg in no way discloses or suggests means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 20. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as equivalent to means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 20.

Col. 1, lines 61-67, of Kleinberg is reproduced above. This section of Kleinberg defines the term "hyperlink." This section of Kleinberg in no way discloses or suggests means for

receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 20. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as equivalent to means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 20.

Since Kleinberg does not disclose or suggest means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, Kleinberg cannot disclose or suggest means for generating a search query using the selected one or more groups of characters, as also required by claim 20. The Office Action alleges that "[c]licking on such a highlighted hyperlink corresponds to generating a search query for at least one page" and points to col. 4, lines 44-52, and col. 7, lines 27-30, of Kleinberg for support (Office Action, pg. 5). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Contrary to the allegation in the Office Action, Appellants submit that clicking a hyperlink to retrieve a document with which the hyperlink is associated is not the same as generating a search query using the selected one or more groups of characters, as required by

claim 20. As correctly described by Kleinberg, when a user selects a hyperlink, the underlying item (e.g., the document with which the hyperlink is associated) is retrieved (see, for example, col. 1, lines 64-67). Retrieving a document in response to a hyperlink being selected does not involve and is not the same as generating a search query. Kleinberg does not support the Office Action's allegation that these two different acts are equivalent and the Office Action does not point to any document that supports this allegation.

Col. 4, lines 44-52, of Kleinberg is reproduced above. This section of Kleinberg discloses a search may result in a page or group of pages and that this page (or group of pages) may include hyperlinks to other pages. This section of Kleinberg in no way discloses or suggests means for generating a search query using the selected one or more groups of characters, as required by claim 20. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query. In fact, this section of Kleinberg does not even mention selecting a hyperlink.

Col. 7, lines 27-30, of Kleinberg is reproduced above. This section of Kleinberg discloses that a page with subject matter of interest to a user may be supplemented with other pages linked to or from that page. This section of Kleinberg in no way discloses or suggests means for generating a search query using the selected one or more groups of characters, as required by claim 20. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query.

For at least the foregoing reasons, Appellants submit that the rejection of claim 20 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 20 be reversed.

15. Claim 21.

Independent claim 21 is directed to a system for facilitating performance of a search. The system includes a browser configured to retrieve a document and present the document to a user; and a browser assistant configured to detect selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, generate a search query from the selected one or more groups of characters, retrieve search results based on the search query, and present the search results to the user.

Kleinberg does not disclose or suggest the combination of features recited in claim 21.

With respect to the features recited in claim 21, the Office Action alleges "the method of Kleinberg iterates the process to find linked pages [COL 4 lines 53-65], where pages are documents" (Office Action, pg. 5). Appellants submit that this allegation in no way addresses the above features of claim 21. Accordingly, a proper case of anticipation has not been established with respect to claim 21.

Nonetheless, at col. 4, lines 53-65, Kleinberg discloses:

Then, authoritativeness information is obtained for the pages of the initial set. The authoritativeness information exists on a per page basis, and is related to the number of links to or from the page. At first, the links are simply counted. In a preferred class of embodiments, however, a sequence of iterations are performed, in which the authoritativeness information, in the form of scores such as numerical scores, is produced, for each given page in each successive iteration, by summing the scores, from the previous iteration, of pages linked to or from the given page. Preferably, the scores are normalized after each iteration. It can be proven that the scores obtained in this fashion will converge.

This section of Kleinberg discloses obtaining authoritativeness information for pages in an initial set of pages. Neither this section of Kleinberg nor any other section of Kleinberg discloses or

suggests a browser assistant configured to detect selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, generate a search query from the selected one or more groups of characters, retrieve search results based on the search query, and present the search results to the user, as required by claim 21.

With respect to claim 42, the Office Action alleges that Kleinberg's "iteration module" corresponds to a browser assistant (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants note that Kleinberg does not disclose an "iteration module." Instead, Kleinberg discloses an iterative algorithm (see, for example, col. 7, lines 12-13). Kleinberg does not disclose or suggest that this iterative algorithm is configured to detect selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, generate a search query from the selected one or more groups of characters, retrieve search results based on the search query, and present the search results to the user, as required by claim 21. Moreover, the Office Action does not point to any section of Kleinberg that discloses that this iterative algorithm is configured to detect selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, generate a search query from the selected one or more groups of characters, retrieve search results based on

the search query, and present the search results to the user, as required by claim 21. As such, a proper case of anticipation has not been established with respect to claim 21.

For at least the foregoing reasons, Appellants submit that the rejection of claim 21 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 21 be reversed.

16. Claim 22.

Independent claim 22 is directed to a web browser embodied in a computer-readable medium. The web browser includes instructions for identifying a document; instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted; instructions for generating a search query from the selected one or more groups of characters; instructions for obtaining search results based on the search query; and instructions for providing the search results. Kleinberg does not disclose or suggest the combination of features recited in claim 22.

For example, Kleinberg does not disclose or suggest instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. With respect to these features, the Office Action alleges:

One object of Kleinberg is to search for resources such as Web pages that are linked with hyperlinks [COL 4 lines 11-16]. Kleinberg is an improvement on the background technology in which hyperlinks may be highlighted [COL 2 line 49 to COL 3 line 4]. A set of highlighted words, pictures or icons associated with hyperlinks corresponds to a search object that initiates a search [COL 2 lines 51-

56]. So does a hyperlink embedded in a displayed and/or highlighted item such as a word, phrase, icon or picture [COL 1 lines 61-67]

(Office Action, pg. 5). Appellants submit that the Office Action has mischaracterized the above features of claim 22.

Claim 22 does not recite clicking on a hyperlink in a document. Instead, claim 22 clearly and specifically recites instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. Selection of a hyperlink in a document in no way relates to instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 22.

Col. 4, lines 11-16, of Kleinberg is reproduced above. This section of Kleinberg discloses finding a set of information resources that are authoritative to a particular subject. This section of Kleinberg in no way discloses or suggests instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 22.

Col. 2, line 49, to col. 3, line 4, of Kleinberg is reproduced above. This section of Kleinberg corresponds to the background section of Kleinberg. This section of Kleinberg discloses that a hyperlink may be highlighted in a web page and that a mouse click will activate the hyperlink. This section of Kleinberg in no way discloses or suggests instructions for

obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim

22. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink to retrieve a document as equivalent to instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 22.

Col. 1, lines 61-67, of Kleinberg is reproduced above. This section of Kleinberg defines the term "hyperlink." This section of Kleinberg in no way discloses or suggests instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 22. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as equivalent to instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 22.

Since Kleinberg does not disclose or suggest instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in

the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, Kleinberg cannot disclose or suggest instructions for generating a search query from the selected one or more groups of characters, as also required by claim 22. The Office Action alleges that "[c]licking on such a highlighted hyperlink corresponds to generating a search query for at least one page" and points to col. 4, lines 44-52, and col. 7, lines 27-30, of Kleinberg for support (Office Action, pg. 5). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Contrary to the allegation in the Office Action, Appellants submit that clicking a hyperlink to retrieve a document with which the hyperlink is associated is not the same as generating a search query from the selected one or more groups of characters, as required by claim 22. As correctly described by Kleinberg, when a user selects a hyperlink, the underlying item (e.g., the document with which the hyperlink is associated) is retrieved (see, for example, col. 1, lines 64-67). Retrieving a document in response to a hyperlink being selected does not involve and is not the same as generating a search query. Kleinberg does not support the Office Action's allegation that these two different acts are equivalent and the Office Action does not point to any document that supports this allegation.

Col. 4, lines 44-52, of Kleinberg is reproduced above. This section of Kleinberg discloses a search may result in a page or group of pages and that this page (or group of pages) may include hyperlinks to other pages. This section of Kleinberg in no way discloses or suggests instructions for generating a search query from the selected one or more groups of characters, as required by claim 22. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query. In fact, this

section of Kleinberg does not even mention selecting a hyperlink.

Col. 7, lines 27-30, of Kleinberg is reproduced above. This section of Kleinberg discloses that a page with subject matter of interest to a user may be supplemented with other pages linked to or from that page. This section of Kleinberg in no way discloses or suggests instructions for generating a search query from the selected one or more groups of characters, as required by claim 22. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query.

For at least the foregoing reasons, Appellants submit that the rejection of claim 22 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 22 be reversed.

17. Claim 23.

Independent claim 23 is directed to a computer-readable medium that stores instructions executable by at least one processor to perform a method for executing a search. The instructions include instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted; instructions for generating a search query using the selected one or more groups of characters; instructions for retrieving search results based on the search query; and instructions for presenting the search results to the user. Kleinberg does not disclose or suggest the combination of features recited in claim 23.

For example, Kleinberg does not disclose or suggest instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the

one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. With respect to these features, the Office Action alleges:

One object of Kleinberg is to search for resources such as Web pages that are linked with hyperlinks [COL 4 lines 11-16]. Kleinberg is an improvement on the background technology in which hyperlinks may be highlighted [COL 2 line 49 to COL 3 line 4]. A set of highlighted words, pictures or icons associated with hyperlinks corresponds to a search object that initiates a search [COL 2 lines 51-56]. So does a hyperlink embedded in a displayed and/or highlighted item such as a word, phrase, icon or picture [COL 1 lines 61-67]

(Office Action, pg. 5). Appellants submit that the Office Action has mischaracterized the above features of claim 23.

Claim 23 does not recite clicking on a hyperlink in a document. Instead, claim 23 clearly and specifically recites instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. Selection of a hyperlink in a document in no way relates to instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 23.

Col. 4, lines 11-16, of Kleinberg is reproduced above. This section of Kleinberg discloses finding a set of information resources that are authoritative to a particular subject. This section of Kleinberg in no way discloses or suggests instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or

more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 23.

Col. 2, line 49, to col. 3, line 4, of Kleinberg is reproduced above. This section of Kleinberg corresponds to the background section of Kleinberg. This section of Kleinberg discloses that a hyperlink may be highlighted in a web page and that a mouse click will activate the hyperlink. This section of Kleinberg in no way discloses or suggests instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 23. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink to retrieve a document as equivalent to detecting selection of one or more groups of characters in response to a search object being selected while the one or more groups of characters are highlighted in a document, as required by claim 23.

Col. 1, lines 61-67, of Kleinberg is reproduced above. This section of Kleinberg defines the term "hyperlink." This section of Kleinberg in no way discloses or suggests instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 23. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as

equivalent to detecting selection of one or more groups of characters in response to a search object being selected while the one or more groups of characters are highlighted in a document, as required by claim 23.

Since Kleinberg does not disclose or suggest instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, Kleinberg cannot disclose or suggest instructions for generating a search query using the selected one or more groups of characters, as also required by claim 23. The Office Action alleges that "[c]licking on such a highlighted hyperlink corresponds to generating a search query for at least one page" and points to col. 4, lines 44-52, and col. 7, lines 27-30, of Kleinberg for support (Office Action, pg. 5). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Contrary to the allegation in the Office Action, Appellants submit that clicking a hyperlink to retrieve a document with which the hyperlink is associated is not the same as generating a search query using the selected one or more groups of characters, as required by claim 23. As correctly described by Kleinberg, when a user selects a hyperlink, the underlying item (e.g., the document with which the hyperlink is associated) is retrieved (see, for example, col. 1, lines 64-67). Retrieving a document in response to a hyperlink being selected does not involve and is not the same as generating a search query. Kleinberg does not support the Office Action's allegation that these two different acts are equivalent and the Office Action does not point to any document that supports this allegation.

Col. 4, lines 44-52, of Kleinberg is reproduced above. This section of Kleinberg discloses a search may result in a page or group of pages and that this page (or group of pages) may include hyperlinks to other pages. This section of Kleinberg in no way discloses or suggests instructions for generating a search query using the selected one or more groups of characters, as required by claim 23. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query. In fact, this section of Kleinberg does not even mention selecting a hyperlink.

Col. 7, lines 27-30, of Kleinberg is reproduced above. This section of Kleinberg discloses that a page with subject matter of interest to a user may be supplemented with other pages linked to or from that page. This section of Kleinberg in no way discloses or suggests instructions for generating a search query using the selected one or more groups of characters, as required by claim 23. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query.

For at least the foregoing reasons, Appellants submit that the rejection of claim 23 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 23 be reversed.

18. Claim 24.

Independent claim 24 is directed to a method for performing a search in a network that includes a client and a server. The method includes obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted; generating, by the

client, a search query using the selected one or more groups of characters; generating, by the server, search results based on the search query; obtaining, by the client, the search results from the server; and presenting, by the client, the search results to the user. Kleinberg does not disclose or suggest the combination of features recited in claim 24.

For example, Kleinberg does not disclose or suggest obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. With respect to these features, the Office Action alleges:

One object of Kleinberg is to search for resources such as Web pages that are linked with hyperlinks [COL 4 lines 11-16]. Kleinberg is an improvement on the background technology in which hyperlinks may be highlighted [COL 2 line 49 to COL 3 line 4]. A set of highlighted words, pictures or icons associated with hyperlinks corresponds to a search object that initiates a search [COL 2 lines 51-56]. So does a hyperlink embedded in a displayed and/or highlighted item such as a word, phrase, icon or picture [COL 1 lines 61-67]

(Office Action, pg. 5). Appellants submit that the Office Action has mischaracterized the above features of claim 24.

Claim 24 does not recite clicking on a hyperlink in a document. Instead, claim 24 clearly and specifically recites obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted. Selection of a hyperlink in a document in no way relates to instructions for obtaining selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document

being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 24.

Col. 4, lines 11-16, of Kleinberg is reproduced above. This section of Kleinberg discloses finding a set of information resources that are authoritative to a particular subject. This section of Kleinberg in no way discloses or suggests obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 24.

Col. 2, line 49, to col. 3, line 4, of Kleinberg is reproduced above. This section of Kleinberg corresponds to the background section of Kleinberg. This section of Kleinberg discloses that a hyperlink may be highlighted in a web page and that a mouse click will activate the hyperlink. This section of Kleinberg in no way discloses or suggests obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 24. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink to retrieve a document as equivalent to obtaining selection of one or more groups of characters in response to a search object being selected while the one or more groups of characters are highlighted in a document, as required by claim 24.

Col. 1, lines 61-67, of Kleinberg is reproduced above. This section of Kleinberg defines

the term "hyperlink." This section of Kleinberg in no way discloses or suggests obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, as required by claim 24. Appellants submit that one skilled in the art at the time of Appellants' invention would not reasonably construe clicking on a highlighted hyperlink as equivalent to obtaining selection of one or more groups of characters in response to a search object being selected while the one or more groups of characters are highlighted in a document, as required by claim 24.

Since Kleinberg does not disclose or suggest obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, Kleinberg cannot disclose or suggest generating, by the client, a search query using the selected one or more groups of characters, as also required by claim 24. The Office Action alleges that "[c]licking on such a highlighted hyperlink corresponds to generating a search query for at least one page" and points to col. 4, lines 44-52, and col. 7, lines 27-30, of Kleinberg for support (Office Action, pg. 5). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Contrary to the allegation in the Office Action, Appellants submit that clicking a hyperlink to retrieve a document with which the hyperlink is associated is not the same as generating a search query using the selected one or more groups of characters, as required by

claim 24. As correctly described by Kleinberg, when a user selects a hyperlink, the underlying item (e.g., the document with which the hyperlink is associated) is retrieved (see, for example, col. 1, lines 64-67). Retrieving a document in response to a hyperlink being selected does not involve and is not the same as generating a search query. Kleinberg does not support the Office Action's allegation that these two different acts are equivalent and the Office Action does not point to any document that supports this allegation.

Col. 4, lines 44-52, of Kleinberg is reproduced above. This section of Kleinberg discloses a search may result in a page or group of pages and that this page (or group of pages) may include hyperlinks to other pages. This section of Kleinberg in no way discloses or suggests generating, by the client, a search query using the selected one or more groups of characters, as required by claim 24. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query. In fact, this section of Kleinberg does not even mention selecting a hyperlink.

Col. 7, lines 27-30, of Kleinberg is reproduced above. This section of Kleinberg discloses that a page with subject matter of interest to a user may be supplemented with other pages linked to or from that page. This section of Kleinberg in no way discloses or suggests generating, by the client, a search query using the selected one or more groups of characters, as required by claim 24. Moreover, this section of Kleinberg does not support the Office Action's allegation that selecting a hyperlink is equivalent to generating a search query.

For at least the foregoing reasons, Appellants submit that the rejection of claim 24 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 24 be reversed.

19. Claims 25-27, 30, and 35-38.

Independent claim 25 is directed to a method for prefetching documents associated with a search. The method includes identifying a document that includes one or more links, where each of the links corresponds to a linked document; analyzing each of the links in the document; determining a score for each of the links; and prefetching a number of the linked documents corresponding to a number of the links based on the determined scores. Kleinberg does not disclose or suggest this combination of features.

For example, Kleinberg does not disclose or suggest prefetching a number of linked documents corresponding to a number of the links based on the determined scores. In fact, Kleinberg does not disclose or suggest prefetching any linked documents.

With respect to the above features, the Office Action alleges that:

determination of the start set (initial set of pages) in Kleinberg [COL 4 line 44] corresponds to prefetching documents associated with a search. Kleinberg counts links and determines scores for each stage of iteration [COL 4 lines 53-65]

(Office Action, pg. 6). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Kleinberg discloses that a user may generate an initial set from a single page or a group of pages (e.g., obtained as a result of a search) and may supplement the initial set to include the page or pages that link to or from the single page or group of pages (see, for example, col. 4, lines 44-52, and col. 7, lines 21-30). Contrary to the allegation in the Office Action, Kleinberg does not disclose or suggest that any of the documents in the initial set of documents is prefetched. Identifying documents as an initial set of documents is not equivalent to prefetching documents, as that term is known in the art. Kleinberg does not disclose or suggest prefetching a

number of linked documents corresponding to a number of the links based on the determined scores, as required by claim 25.

At col. 4, line 44, Kleinberg discloses that an initial set of pages is obtained. This section of Kleinberg in no way discloses or suggests prefetching a number of linked documents corresponding to a number of the links based on the determined scores, as required by claim 25.

At col. 4, lines 53-64, Kleinberg discloses:

Then, authoritativeness information is obtained for the pages of the initial set. The authoritativeness information exists on a per page basis, and is related to the number of links to or from the page. At first, the links are simply counted. In a preferred class of embodiments, however, a sequence of iterations are performed, in which the authoritativeness information, in the form of scores such as numerical scores, is produced, for each given page in each successive iteration, by summing the scores, from the previous iteration, of pages linked to or from the given page. Preferably, the scores are normalized after each iteration. It can be proven that the scores obtained in this fashion will converge.

This section of Kleinberg discloses determining a score for each page by counting the number of pages linked to or from the given page. Kleinberg uses the determined score for a page as an authoritativeness indication for the page. This section of Kleinberg does not disclose or suggest prefetching a number of linked documents corresponding to a number of the links based on the authoritative scores, as would be required by the Office Action's interpretation of claim 25.

For at least the foregoing reasons, Appellants submit that the rejection of claim 25 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 25 be reversed.

Claims 26, 27, 30, and 35-38 depend from claim 25. Therefore, these claims are not anticipated by Kleinberg for at least the reasons given above with respect to claim 25.

20. Claim 28.

Claim 28 depends from claim 25. Therefore, claim 28 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 25. Moreover, claim 28 recites additional features not disclosed or suggested by Kleinberg.

Claim 28 recites receiving selection of one of the links in the document, determining whether the selected link corresponds to one of the prefetched documents and providing the one prefetched document when the selected link corresponds to the one prefetched document. At the outset, Appellants submit that since Kleinberg does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, Kleinberg cannot disclose or suggest the above features of claim 28.

With respect to the features recited in claim 28, the Office Action alleges:

the iteration procedure of Kleinberg grows the set of pages returned [FIG 1] by finding documents linked to those already returned [COL 8 line 42 and after], which includes providing a prefetched document already found and providing one not yet found

(Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

As set forth above, Kleinberg generates an initial set of pages from a single page or a group of pages (e.g., obtained as a result of a search) and supplements the initial set to include the page or pages that link to or from the single page or group of pages (see, for example, col. 4, lines 44-52, and col. 7, lines 21-30). Kleinberg in no way discloses or suggests receiving selection of one of the links in a document and determining whether the selected link corresponds to one of the prefetched documents, as required by claim 28.

Fig. 1 of Kleinberg depicts an iterative process for obtaining authoritative pages on a

desired subject. Neither this figure nor its corresponding description discloses or suggests receiving selection of one of the links in the document, determining whether the selected link corresponds to one of the prefetched documents and providing the one prefetched document when the selected link corresponds to the one prefetched document, as required by claim 28.

At col. 8, line 42, and after, Kleinberg discloses defining hub and authority vectors H and A, where each term in each vector corresponds to one of the pages in the set of pages that either point to a page or are pointed to by a page in the set. This section of Kleinberg does not disclose or suggest receiving selection of one of the links in the document, determining whether the selected link corresponds to one of the prefetched documents and providing the one prefetched document when the selected link corresponds to the one prefetched document, as required by claim 28.

For at least the foregoing reasons, Appellants submit that the rejection of claim 28 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 28 be reversed.

21. Claim 29.

Claim 29 depends from claim 28. Therefore, claim 29 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 28. Moreover, claim 29 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 29 recites retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents. At the outset, Appellants submit that since Kleinberg does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores

for the links, Kleinberg cannot disclose or suggest the above feature of claim 29.

With respect to the feature recited in claim 29, the Office Action alleges:

the iteration procedure of Kleinberg grows the set of pages returned [FIG 1] by finding documents linked to those already returned [COL 8 line 42 and after], which includes providing a prefetched document already found and providing one not yet found

(Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

As set forth above, Kleinberg generates an initial set of pages from a single page or a group of pages (e.g., obtained as a result of a search) and supplements the initial set to include the page or pages that link to or from the single page or group of pages (see, for example, col. 4, lines 44-52, and col. 7, lines 21-30). Kleinberg in no way discloses or suggests retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents, as required by claim 29.

Fig. 1 of Kleinberg depicts an iterative process for obtaining authoritative pages on a desired subject. Neither this figure nor its corresponding description discloses or suggests retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents, as required by claim 29.

At col. 8, line 42, and after, Kleinberg discloses defining hub and authority vectors H and A, where each term in each vector corresponds to one of the pages in the set of pages that either point to a page or are pointed to by a page in the set. This section of Kleinberg does not disclose or suggest retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents, as required by claim 29.

For at least the foregoing reasons, Appellants submit that the rejection of claim 29 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection be reversed.

22. Claim 31.

Claim 31 depends indirectly from claim 25. Therefore, claim 31 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 25. Moreover, claim 31 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 31 recites that the prefetching includes using an address lookup to prefetch the linked documents corresponding to the number of the links. At the outset, Appellants submit that since Kleinberg does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, Kleinberg cannot disclose or suggest the above feature of claim 31. The Office Action does not address the feature recited in claim 31. Therefore, the Office Action has not established a proper case of anticipation with respect to claim 31.

For at least the foregoing reasons, Appellants submit that the rejection of claim 31 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection be reversed.

23. Claim 32.

Claim 32 depends from claim 25. Therefore, claim 32 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 25. Moreover, claim 32 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 32 recites that the prefetching includes prefetching the linked documents

corresponding to all of the links in the document. At the outset, Appellants submit that since Kleinberg does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, Kleinberg cannot disclose or suggest the above feature of claim 32. The Office Action does not address the above feature of claim 32. Therefore, the Office Action has not established a proper case of anticipation with respect to claim 32.

For at least the foregoing reasons, Appellants submit that the rejection of claim 32 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 32 be reversed.

24. Claim 33.

Claim 33 depends from claim 25. Therefore, claim 33 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 25. Moreover, claim 33 recites additional features not disclosed or suggested by Kleinberg.

Claim 33 recites that the determining a score includes for each of the linked documents, determining scores for one or more linking documents that contain links to the linked document, determining a score for each of the linked documents based on the scores of the one or more linking documents, and associating the determined scores for the linked documents with the corresponding links. Kleinberg does not disclose or suggest this combination of features. The Office Action does not address the above features of claim 33. Therefore, the Office Action has not established a proper case of anticipation with respect to claim 33.

For at least the foregoing reasons, Appellants submit that the rejection of claim 33 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the

rejection of claim 33 be reversed.

25. Claim 39.

Claim 39 depends from claim 25. Therefore, claim 39 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 25. Moreover, claim 39 recites additional features not disclosed or suggested by Kleinberg.

Claim 39 recites that the determining a score includes receiving input from a user, determining a score for each of the linked documents based on the received input, and associating the determined scores for the linked documents with the corresponding links. Kleinberg does not disclose or suggest this combination of features. The Office Action does not address the above features of claim 39. Therefore, the Office Action has not established a proper case of anticipation with respect to claim 39.

For at least the foregoing reasons, Appellants submit that the rejection of claim 39 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 39 be reversed.

26. Claim 40.

Claim 40 depends from claim 39. Therefore, claim 40 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 39. Moreover, claim 40 recites additional features not disclosed or suggested by Kleinberg.

Claim 40 recites that the determining a score for each of the linked documents includes for each of the linked documents, comparing one or more words of the received input with contents of the linked document, and determining a score for the linked document based on a degree of match between the one or more words and the contents of the linked document.

Kleinberg does not disclose or suggest this combination of features. The Office Action does not address the above features of claim 40. Therefore, the Office Action has not established a proper case of anticipation with respect to claim 40.

For at least the foregoing reasons, Appellants submit that the rejection of claim 40 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 40 be reversed.

27. Claim 41.

Claim 41 depends from claim 25. Therefore, claim 41 is not anticipated by Kleinberg for at least the reasons given above with respect to claim 25. Moreover, claim 41 recites an additional feature not disclosed or suggested by Kleinberg.

Claim 41 recites that the prefetching includes retrieving the linked documents with scores of the corresponding links above a predetermined threshold. At the outset, Appellants submit that since Kleinberg does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, Kleinberg cannot disclose or suggest the above feature of claim 41. With respect to claim 41, the Office Action alleges "the method of Kleinberg may limit the retrieved documents by returning only the k largest scores [FIG 1], which corresponds to using a threshold" (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Kleinberg discloses providing a predetermined number of pages (k) with the largest coordinates in the hub vector as hubs and providing the same predetermined number of pages (k) with the largest coordinates in the authority vector as authorities (Fig. 1; col. 9, lines 37-50).

Contrary to the allegation in the Office Action, providing a predetermined number of pages with the largest coordinates as hubs and authorities does not involve and is not equivalent to perfecting a number of the linked documents corresponding to a number of the links in a document based on determined scores for the links, where the prefetching includes retrieving the linked documents with scores of the corresponding links above a predetermined threshold, as required by claim 41. The Office Action does not point to any section of Kleinberg that supports the allegation that these acts are equivalent or explain why one skilled in the art would reasonably interpret these acts as being equivalent.

For at least the foregoing reasons, Appellants submit that the rejection of claim 41 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 41 be reversed.

28. Claim 42.

Independent claim 42 is directed to a system for prefetching documents associated with a search. The system includes a browser configured to retrieve a document that includes one or more links, where each of the links corresponds to a linked document; and a browser assistant configured to identify each of the links in the document, determine a score for each of the identified links, and prefetch a number of the linked documents corresponding to a number of the identified links based on the determined scores. Kleinberg does not disclose or suggest this combination of features.

For example, Kleinberg does not disclose or suggest a browser assistant configured to prefetch a number of the linked documents corresponding to a number of the identified links based on the determined scores. In fact, Kleinberg does not disclose or suggest prefetching any

linked documents. With respect to claim 42, the Office Action alleges "[t]he iteration module of Kleinberg corresponds to a browser assistant" (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants note that Kleinberg does not disclose an "iteration module." Instead, Kleinberg discloses an iterative algorithm (see, for example, col. 7, lines 12-13). Kleinberg does not disclose or suggest that this iterative algorithm is configured to prefetch a number of the linked documents corresponding to a number of the identified links based on the determined scores, as required by claim 42. Moreover, the Office Action does not point to any section of Kleinberg that discloses that this iterative algorithm is configured to prefetch a number of the linked documents corresponding to a number of the identified links based on the determined scores, as required by claim 42. As such, a proper case of anticipation has not been established with respect to claim 42.

For at least the foregoing reasons, Appellants submit that the rejection of claim 42 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 42 be reversed.

29. Claim 43.

Independent claim 43 is directed to a web browser embodied in a computer-readable medium, comprising instructions for identifying a document that includes one or more links, each of the links corresponding to a linked document; instructions for identifying each of the links in the document; instructions for determining a score for each of the identified links; and instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined scores. Kleinberg does not disclose or suggest this combination of

features.

For example, Kleinberg does not disclose or suggest instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined scores. In fact, Kleinberg does not disclose or suggest prefetching any linked documents.

With respect to the above features, the Office Action alleges that:

determination of the start set (initial set of pages) in Kleinberg [COL 4 line 44] corresponds to prefetching documents associated with a search. Kleinberg counts links and determines scores for each stage of iteration [COL 4 lines 53-65]

(Office Action, pg. 6). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Kleinberg discloses that a user may generate an initial set from a single page or a group of pages (e.g., obtained as a result of a search) and may supplement the initial set to include the page or pages that link to or from the single page or group of pages (see, for example, col. 4, lines 44-52, and col. 7, lines 21-30). Contrary to the allegation in the Office Action, Kleinberg does not disclose or suggest that any document in the initial set of documents is prefetched. Identifying documents as an initial set of documents is not equivalent to prefetching documents, as that term is known in the art. Kleinberg does not disclose or suggest instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined scores, as required by claim 43.

At col. 4, line 44, Kleinberg discloses that an initial set of pages is obtained. This section of Kleinberg in no way discloses or suggests instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined scores, as required by claim 43.

Col. 4, lines 53-64, of Kleinberg is reproduced above. This section of Kleinberg discloses determining a score for each page by counting the number of pages linked to or from the given page. Kleinberg uses the determined score for a page as an authoritativeness indication for the page. This section of Kleinberg does not disclose or suggest instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined authoritativeness indication scores, as would be required by the Office Action's interpretation of claim 43.

For at least the foregoing reasons, Appellants submit that the rejection of claim 43 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 43 be reversed.

30. Claim 44.

Independent claim 44 is directed to a computer-readable medium that stores instructions executable by at least one processor to perform a method for prefetching documents associated with a search. The instructions include instructions for obtaining search results that include one or more links, each of the links corresponding to a linked document; instructions for analyzing each of the links; instructions for determining a score for each of the links; and instructions for prefetching the linked documents corresponding to a number of the links based on the determined scores. Kleinberg does not disclose or suggest this combination of features.

For example, Kleinberg does not disclose or suggest instructions for prefetching the linked documents corresponding to a number of the links based on the determined scores. In fact, Kleinberg does not disclose or suggest prefetching any linked documents.

With respect to the above features, the Office Action alleges that:

determination of the start set (initial set of pages) in Kleinberg [COL 4 line 44] corresponds to prefetching documents associated with a search. Kleinberg counts links and determines scores for each stage of iteration [COL 4 lines 53-65]

(Office Action, pg. 6). Appellants respectfully disagree with the Office Action's allegation and interpretation of Kleinberg.

Kleinberg discloses that a user may generate an initial set from a single page or a group of pages (e.g., obtained as a result of a search) and may supplement the initial set to include the page or pages that link to or from the single page or group of pages (see, for example, col. 4, lines 44-52, and col. 7, lines 21-30). Contrary to the allegation in the Office Action, Kleinberg does not disclose or suggest that any document in the initial set of documents is prefetched. Identifying documents as an initial set of documents is not equivalent to prefetching documents, as that term is known in the art. Kleinberg does not disclose or suggest instructions for prefetching the linked documents corresponding to a number of the links based on the determined scores, as required by claim 44.

At col. 4, line 44, Kleinberg discloses that an initial set of pages is obtained. This section of Kleinberg in no way discloses or suggests instructions for prefetching the linked documents corresponding to a number of the links based on the determined scores, as required by claim 44.

Col. 4, lines 53-64, of Kleinberg is reproduced above. This section of Kleinberg discloses determining a score for each page by counting the number of pages linked to or from the given page. Kleinberg uses the determined score for a page as an authoritativeness indication for the page. This section of Kleinberg does not disclose or suggest instructions for prefetching the linked documents corresponding to a number of the links based on the determined authoritativeness indication scores, as would be required by the Office Action's interpretation of

claim 44.

For at least the foregoing reasons, Appellants submit that the rejection of claim 44 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 44 be reversed.

31. Claim 45.

Independent claim 45 is directed to a method for prefetching documents associated with a search in a network that includes a client and a plurality of servers. The method comprises requesting, by the client, a document that includes one or more links, each of the links corresponding to a linked document; providing, by one of the servers, the requested document to the client; analyzing, by the client, each of the links in the requested document; determining, by the client, a score for each of the links; requesting, by the client, a number of the linked documents corresponding to a number of the links based on the determined scores; and providing, by one or more of the servers, the requested linked documents to the client. Kleinberg does not disclose or suggest this combination of features.

For example, Kleinberg does not disclose or suggest requesting, by the client, a number of the linked documents corresponding to a number of the links based on the determined scores and providing, by one or more of the servers, the requested linked documents to the client. The Office Action does not address these features. Accordingly, a proper case of anticipation has not been established with respect to claim 45.

For at least the foregoing reasons, Appellants submit that the rejection of claim 45 under 35 U.S.C. § 102(e) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 45 be reversed.

E. The rejection under 35 U.S.C. § 103(a) based on Kleinberg (U.S. Patent No. 6,112,202) should be reversed.

The initial burden of establishing a *prima facie* basis to deny patentability to a claimed invention always rests upon the Examiner. In re Oetiker, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). In rejecting a claim under 35 U.S.C. § 103, the Examiner must provide a factual basis to support the conclusion of obviousness. In re Warner, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967). Based upon the objective evidence of record, the Examiner is required to make the factual inquiries mandated by Graham v. John Deere Co., 86 S.Ct. 684, 383 U.S. 1, 148 USPQ 459 (1966). The Examiner is also required to explain how and why one having ordinary skill in the art would have been realistically motivated to modify an applied reference and/or combine applied references to arrive at the claimed invention. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988).

In establishing the requisite motivation, it has been consistently held that the requisite motivation to support the conclusion of obviousness is not an abstract concept, but must stem from the prior art as a whole to impel one having ordinary skill in the art to modify a reference or to combine references with a reasonable expectation of successfully achieving some particular realistic objective. See, for example, Interconnect Planning Corp. v. Feil, 227 USPQ 543 (Fed. Cir. 1985). Consistent legal precedent admonishes against the indiscriminate combination of prior art references. Carella v. Starlight Archery, 804 F.2d 135, 231 USPQ 644 (Fed. Cir. 1986); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 227 USPQ 657 (Fed. Cir. 1985).

1. Claim 2.

Claim 2 depends from claim 1. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 1. Moreover, this claim is patentable over Kleinberg for reasons of its own.

Claim 2 recites that the search object is located in at least one of a menu or toolbar. The Office Action admits that Kleinberg does not disclose this feature (Office Action, pg. 7). The Office Action alleges "Official Notice is taken that it was well known at the time of the invention to provide a menu containing a list of the hyperlinks to most-recently visited Web sites within the toolbar of a browser" (Office Action, pg. 7). Regardless of the veracity of this allegation, Appellants submit that the Office Action does not address the feature recited in claim 2.

Appellants' claim 2 does not recite storing hyperlinks in a menu. Instead, Appellants' claim 2 specifically recites that the search object, which is selected while one or more groups of characters are highlighted in a document, is located in at least one of a menu or toolbar. The Office Action does not address this feature. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 2.

Even assuming, for the sake of argument, that one skilled in the art at the time of Appellants' invention would have reasonably construed storing a list of hyperlinks in a menu or toolbar as equivalent to the recited search object (a point that Appellants do not concede), Appellants submit that one skilled in the art would not have been motivated to incorporate this feature into the Kleinberg system, absent impermissible hindsight. With respect to motivation, the Office Action alleges:

[i]t would have been obvious to use such hyperlinks to initiate a search because the linked pages are have a high probability of content of interest and thus may be used to initiate a search in Kleinberg [COL 4 lines 30-33]

(Office Action, pg. 7). Appellants submit that the Office Action's allegation is merely a conclusory statement and provides no reasonable explanation as to why one would seek to alter the Kleinberg system to include a search object, which is selected while one or more groups of characters are highlighted in a document, into the Kleinberg system and to locate this search object in at least one of a menu or toolbar, as required by claim 2. Appellants submit that the Office Action's motivation for altering the Kleinberg system is based on impermissible hindsight.

At col. 4, lines 30-33, Kleinberg discloses:

A user may use the invention if he/she has a page, whose content is of interest, and desires to find other pages which are authoritative as to that content of interest.

This section of Kleinberg discloses that Kleinberg's invention allows users to find pages of interest. This section of Kleinberg in no way would lead one skilled in the art to incorporate a search object, which is selected while one or more groups of characters are highlighted in a document, into the Kleinberg system and to locate this search object in at least one of a menu or toolbar, as required by claim 2. Appellants submit that the Office Action's motivation is based on impermissible hindsight.

For at least the foregoing reasons, Appellants submit that the rejection of claim 2 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 2 be reversed.

2. Claim 8.

Claim 8 depends from claim 7. Therefore, this claim is patentable over Kleinberg for at

least the reasons given above with respect to claim 7. Moreover, claim 8 is patentable over Kleinberg for reasons of its own.

Claim 8 recites that the generating a search query includes discarding those of the identified words in a selected phrase from the search query that are unnecessary for obtaining relevant search results. The Office Action admits that Kleinberg does not disclose this feature (Office Action, pg. 7). The Office Action alleges that "it would have been obvious ... to do so [discard words unnecessary for obtaining relevant results] because it is more efficient to omit unnecessary words" (Office Action, pg. 7). Appellants respectfully submit that the Office Action's motivation is merely a conclusory statement regarding an alleged benefit of removing unnecessary words. The Office Action does not explain why one skilled in the art would reasonably incorporate this feature into the Kleinberg system. As such, a *prima facie* case of obviousness has not been established with respect to claim 8.

Moreover, Appellants note that Office Action relies on Kleinberg's hyperlinks for allegedly corresponding to the selected phrase. With this interpretation in mind, Kleinberg does not disclose or suggest discarding identified words from a hyperlink, as would be required by the Office Action's interpretation of claim 8. Moreover, the Office Action does not explain why one skilled in the art would be motivated to discard identified words from the hyperlinks in Kleinberg. As indicated above, the Office Action's motivation for altering the Kleinberg system to include the feature of claim 8 is based on impermissible hindsight.

For at least the foregoing reasons, Appellants submit that the rejection of claim 8 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 8 be reversed.

3. Claims 13.

Claim 13 depends indirectly from claim 9. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 9. Moreover, claim 13 is patentable over Kleinberg for reasons of its own.

Claim 13 recites that the using the selected paragraph include discarding stop words in the selected paragraph from the search query. The Office Action admits that Kleinberg does not disclose this feature (Office Action, pg. 7). The Office Action alleges that "it would have been obvious ... to do so [discard words unnecessary for obtaining relevant results] because it is more efficient to omit unnecessary words" (Office Action, pg. 7). Appellants respectfully submit that the Office Action's motivation is merely a conclusory statement regarding an alleged benefit of removing unnecessary words. The Office Action does not explain why one skilled in the art would reasonably incorporate this feature into the Kleinberg system. As such, a *prima facie* case of obviousness has not been established with respect to claim 13.

Moreover, Appellants note that Office Action relies on Kleinberg's hyperlinks for allegedly corresponding to the selected paragraph. With this interpretation in mind, Kleinberg does not disclose or suggest discarding stop words from a hyperlink, as would be required by the Office Action's interpretation of claim 13. Moreover, the Office Action does not explain why one skilled in the art would be motivated to discard stop words from the hyperlinks in Kleinberg. As indicated above, the Office Action's motivation for altering the Kleinberg system to include the feature of claim 13 is based on impermissible hindsight.

For at least the foregoing reasons, Appellants submit that the rejection of claim 13 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the

rejection of claim 13 be reversed.

4. Claim 34.

Claim 34 depends from claim 25. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 25. Moreover, this claim recites additional features not disclosed or suggested by Kleinberg.

Claim 34 recites that the determining a score includes determining a clickthrough rate for each of the linked documents, determining a score for each of the linked documents based on the determined clickthrough rates, and associating the determined scores for the linked documents with the corresponding links. Kleinberg does not disclose or suggest this combination of features.

For example, Kleinberg does not disclose or suggest determining a score for each of the linked documents based on the determined clickthrough rates. The Office Action admits that Kleinberg does not disclose this feature (Office Action, pg. 7). The Office Action alleges that:

Official Notice is taken that the clickthrough rate was a well-known measure of user interest at the time of the invention. Evidence for this is given by Wu et al, US 6,741,967 Table B COL 19], where such a rate is used as a measure of usability for advertisements.

The Specification of this application also teaches that it was well known in the art at the time of the invention [[page 17 line 15 to page 18 line 3]

(Office Action, pp. 7-8). Appellants respectfully disagree with the Office Action's allegations.

At the outset, Appellants note that Wu et al. may disclose that using clickthrough rates in relation to advertising was known in the art at the time of Appellants' invention. Wu et al. in no way discloses or suggests, however, that determining a score for each of the linked documents based on determined clickthrough rates, as required by claim 34, was well known in the art at the

time of Appellants' invention. Moreover, Appellants note that Appellants' Specification discloses that clickthrough measurements are commonplace in many current web sites (page 17, lines 18-19). Appellants' Specification in no way discloses or suggests that determining a score for each of the linked documents based on determined clickthrough rates, as required by claim 34, is commonplace. The Office Action's allegations to the contrary are without merit.

With respect to motivation, the Office Action alleges "[i]t would have been obvious ... to apply clickthrough rate to score documents because it is a useful measure of user interest" (Office Action, pg. 8). Appellants submit that the Office Action's motivation falls short of establishing a *prima facie* basis of obviousness.

The Office Action's motivation does not explain why one skilled in the art at the time of Appellants' invention would have been motivated to alter the Kleinberg system to include the above feature of claim 34. Instead, the Office Action merely provides a conclusory statement regarding an alleged benefit of using clickthrough rates. Such conclusory statements have been repeatedly held to be insufficient for establishing a *prima facie* case of obviousness. In this respect, Appellants rely upon In re Deuel, 51 F.3d 1552, 34 USPQ2d 1210 (Fed. Cir. 1995), where it was held that generalizations do not establish the realistic motivation to modify a specific reference in a specific manner to arrive at a specifically claimed invention. Appellants submit that the Office Action's purported motivation to presumably alter the Kleinberg system to include the features of claim 34 is merely conclusory and based on impermissible hindsight.

For at least the foregoing reasons, Appellants submit that the rejection of claim 34 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 34 be reversed.

5. Claims 46 and 53.

Independent claim 46 is directed to a computer-implemented method for supplementing a document with links to related documents. The method includes analyzing a document to identify one or more pieces of information; determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and adding the links to the document. Kleinberg does not disclose or suggest this combination of features.

The Office Action appears to admit that Kleinberg does not disclose the features of claim 46 (Office Action, pg. 8). With respect to the above features of claim 46, the Office Action alleges "the list of most-recently visited Web sites corresponds to adding links to the Web page document being displayed" (Office Action, pg. 8). At the outset, Appellants are unclear to what list of most-recently visited Web sites the Office Action refers. Kleinberg does not disclose a list of most-recently visited Web sites or adding such a list to a Web page document being displayed. Moreover, the above allegation regarding claim 46 in no way addresses the specifically recited features of claim 46. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 46.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest analyzing a document to identify one or more pieces of information; determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and adding the links to the document, as required by claim 46. Moreover, the Office Action does not explain why one skilled in the art would be motivated to

incorporate these features into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 46 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 46 be reversed.

Claim 53 depends from claim 46. Therefore, Appellants request that the rejection of claim 53 be reversed for at least the reasons given above with respect to claim 46.

6. Claim 47.

Claim 47 depends from claim 46. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 46. Moreover, this claim recites an additional feature not disclosed or suggested by Kleinberg.

Claim 47 recites that the pieces of information include at least one of a name, a product, a publication, or a key phrase. Kleinberg does not disclose or suggest this feature.

The Office Action appears to admit that Kleinberg does not disclose this feature (Office Action, pg. 8). The Office Action alleges "such a visited page is a publication and a name, and includes a link associated with the name" (Office Action, pg. 8). At the outset, Appellants are unclear to what visited page the Office Action refers. Kleinberg does not disclose a visited page being a publication and a name. Moreover, the above allegation regarding claim 47 in no way addresses the specifically recited feature of claim 47. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 47.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest analyzing a document to identify one or more pieces of information, where the pieces of information include at least one of a name, a

product, a publication, or a key phrase, as required by claim 47. Moreover, the Office Action does not explain why one skilled in the art would be motivated to incorporate this feature into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 47 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 47 be reversed.

7. Claim 48.

Claim 48 depends from claim 47. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 47. Moreover, this claim recites additional features not disclosed or suggested by Kleinberg.

Claim 48 recites that when the pieces of information include one or more names, the determining a link includes for each of the names, identifying one or more related documents that include a link associated with the name, and determining one or more links corresponding to the identified documents. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 48. Instead, the Office Action alleges "such a visited page is a publication and a name, and includes a link associated with the name" (Office Action, pg. 8). This allegation in the final Office Action in no way addresses the specific features recited in Appellants' claim 48. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 48.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest analyzing a document to identify one or more pieces of information and when the pieces of information include one or more names,

the determining a link includes for each of the names, identifying one or more related documents that include a link associated with the name, and determining one or more links corresponding to the identified documents, as required by claim 48. Moreover, the Office Action does not explain why one skilled in the art would be motivated to incorporate these features into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 48 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 48 be reversed.

8. Claim 49.

Claim 49 depends from claim 47. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 47. Moreover, this claim recites additional features not disclosed or suggested by Kleinberg.

Claim 49 recites that when the pieces of information include information regarding one or more products, the determining a link includes identifying, for each of the products, one or more related documents associated with at least one of a producer, a seller, or a review of the product, and determining one or more links corresponding to the identified documents. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 49. Instead, the Office Action alleges:

in cases where the link is to a commercial Web site, it links to related documents associated with producers, sellers, reviewers and the like

(Office Action, pg. 8). Appellants submit that this allegation (regardless of its veracity) in no way addresses the above features of claim 49. Accordingly, a *prima facie* case of obviousness

has not been established with respect to claim 49.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest analyzing a document to identify one or more pieces of information and when the pieces of information include information regarding one or more products, the determining a link includes identifying, for each of the products, one or more related documents associated with at least one of a producer, a seller, or a review of the product, and determining one or more links corresponding to the identified documents, as required by claim 49. Moreover, the Office Action does not explain why one skilled in the art would be motivated to incorporate these features into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 49 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 49 be reversed.

9. Claim 50.

Claim 50 depends from claim 47. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 47. Moreover, this claim recites additional features not disclosed or suggested by Kleinberg.

Claim 50 recites that when the pieces of information include information regarding one or more publications, the determining a link includes identifying, for each of the publications, one or more related documents that include the publication, and determining one or more links corresponding to the identified documents. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 50. Instead, the Office Action

alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above features of claim 50. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 50.

For at least the foregoing reasons, Appellants submit that the rejection of claim 50 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 50 be reversed.

10. Claim 51.

Claim 51 depends from claim 47. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 47. Moreover, this claim recites additional features not disclosed or suggested by Kleinberg.

Claim 51 recites that when the pieces of information include one or more key phrases, the determining a link includes identifying, for each of the key phrases, one or more related documents that include the key phrase, and determining one or more links corresponding to the identified documents. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 51. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above features of claim 51. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 51.

For at least the foregoing reasons, Appellants submit that the rejection of claim 51 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the

rejection of claim 51 be reversed.

11. Claim 52.

Claim 52 depends from claim 46. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 46. Moreover, this claim recites additional features not disclosed or suggested by Kleinberg.

Claim 52 recites that the determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information includes sending each of the identified pieces of information to a server, and receiving a link corresponding to each of the identified pieces of information from the server. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 52. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above features of claim 52. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 52.

For at least the foregoing reasons, Appellants submit that the rejection of claim 52 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 52 be reversed.

12. Claim 54.

Claim 54 depends from claim 46. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 46. Moreover, this claim recites an additional feature not disclosed or suggested by Kleinberg.

Claim 54 recites that the adding the links to the document includes modifying the document to include the links. Kleinberg does not disclose or suggest this feature.

The Office Action does not address the feature of claim 54. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above feature of claim 54. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 54.

For at least the foregoing reasons, Appellants submit that the rejection of claim 54 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 54 be reversed.

13. Claim 55.

Claim 55 depends from claim 46. Therefore, this claim is patentable over Kleinberg for at least the reasons given above with respect to claim 46. Moreover, this claim recites an additional feature not disclosed or suggested by Kleinberg.

Claim 55 recites that the adding the links to the document includes providing a separate document that includes the links. Kleinberg does not disclose or suggest this feature.

The Office Action does not address the features of claim 55. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above feature of claim 55. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 55.

For at least the foregoing reasons, Appellants submit that the rejection of claim 55 under

35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 55 be reversed.

14. Claim 56.

Independent claim 56 is directed to a system for supplementing a document with links to related documents. The system includes a browser configured to identify a document; and a browser assistant configured to analyze the document to identify one or more pieces of information, determine a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information, and provide the determined links with the document. Kleinberg does not disclose or suggest this combination of features.

For example, Kleinberg does not disclose or suggest a browser assistant configured to analyze the document to identify one or more pieces of information, determine a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information, and provide the determined links with the document. The Office Action does not address this feature. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above feature of claim 56. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 56.

With respect to claim 42, the Office Action alleges "[t]he iteration module of Kleinberg corresponds to a browser assistant" (Office Action, pg. 6). Appellants respectfully disagree with the Office Action's interpretation of Kleinberg.

At the outset, Appellants note that Kleinberg does not disclose an "iteration module." Instead, Kleinberg discloses an iterative algorithm (see, for example, col. 7, lines 12-13). Kleinberg does not disclose or suggest that this iterative algorithm is configured to identify a document; and a browser assistant configured to analyze the document to identify one or more pieces of information, determine a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information, and provide the determined links with the document, as required by claim 56. Moreover, the Office Action does not explain why one skilled in the art at the time of Appellants' invention would be motivated to incorporate the recited browser assistant into the Kleinberg system. As such, a *prima facie* case of obviousness has not been established with respect to claim 56.

For at least the foregoing reasons, Appellants submit that the rejection of claim 56 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 56 be reversed.

15. Claim 57.

Independent claim 57 is directed to a web browser embodied in a computer-readable medium, comprising instructions for identifying a document; instructions for analyzing the document to identify one or more pieces of information; instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; instructions for presenting the document with the determined links to a user. The Office Action appears to admit that Kleinberg does not disclose these features (Office Action, pg. 8). With respect to the above

features of claim 57, the Office Action alleges "the list of most-recently visited Web sites corresponds to adding links to the Web page document being displayed" (Office Action, pg. 8). At the outset, Appellants are unclear to what list of most-recently visited Web sites the Office Action refers. Kleinberg does not disclose a list of most-recently visited Web sites or adding such a list to a Web page document being displayed. Moreover, the above allegation regarding claim 57 in no way addresses the specifically recited features of claim 57. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 57.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest instructions for identifying a document; instructions for analyzing the document to identify one or more pieces of information; instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; instructions for presenting the document with the determined links to a user, as required by claim 57. Moreover, the Office Action does not explain why one skilled in the art would be motivated to incorporate these features into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 57 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 57 be reversed.

16. Claim 58.

Independent claim 58 is directed to a computer-readable medium that stores instructions executable by at least one processor to perform a method for supplementing a document with links to related documents, comprising instructions for identifying one or more pieces of

information in the document; instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents using each of the identified pieces of information; and instructions for providing the determined links with the document. The Office Action appears to admit that Kleinberg does not disclose these features (Office Action, pg. 8). With respect to the above features of claim 58, the Office Action alleges "the list of most-recently visited Web sites corresponds to adding links to the Web page document being displayed" (Office Action, pg. 8). At the outset, Appellants are unclear to what list of most-recently visited Web sites the Office Action refers. Kleinberg does not disclose a list of most-recently visited Web sites or adding such a list to a Web page document being displayed. Moreover, the above allegation regarding claim 58 in no way addresses the specifically recited features of claim 58. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 58.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest instructions for identifying one or more pieces of information in the document; instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents using each of the identified pieces of information; and instructions for providing the determined links with the document, as required by claim 58. Moreover, the Office Action does not explain why one skilled in the art would be motivated to incorporate these features into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 58 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the

rejection of claim 58 be reversed.

17. Claim 59.

Independent claim 59 is directed to a method for supplementing a document with links to related documents in a network that includes a client and a server. The method includes requesting, by the client, a document; providing, by the server, the requested document to the client; analyzing, by the client, the requested document to identify one or more pieces of information; determining, by the client, a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and modifying, by the client, the requested document to include the links. The Office Action appears to admit that Kleinberg does not disclose these features (Office Action, pg. 8). With respect to the above features of claim 59, the Office Action alleges "the list of most-recently visited Web sites corresponds to adding links to the Web page document being displayed" (Office Action, pg. 8). At the outset, Appellants are unclear to what list of most-recently visited Web sites the Office Action refers. Kleinberg does not disclose a list of most-recently visited Web sites or adding such a list to a Web page document being displayed. Moreover, the above allegation regarding claim 59 in no way addresses the specifically recited features of claim 59. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 59.

Kleinberg is directed to finding Web pages that are authoritative regarding a desired subject (Abstract). Kleinberg does not disclose or suggest requesting, by the client, a document; providing, by the server, the requested document to the client; analyzing, by the client, the requested document to identify one or more pieces of information; determining, by the client, a

link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and modifying, by the client, the requested document to include the links, as required by claim 59. Moreover, the Office Action does not explain why one skilled in the art would be motivated to incorporate these features into the Kleinberg system.

For at least the foregoing reasons, Appellants submit that the rejection of claim 59 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claim 59 be reversed.

18. Claim 60.

Independent claim 60 is directed to a hypertext browser assistant embodied in a computer-readable medium, comprising instructions for detecting selection of one or more words in a document currently accessed by a user; instructions for generating a search query using the selected one or more words; instructions for retrieving a document based on the search query; instructions for identifying one or more pieces of information in the document; instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; instructions for adding the links to the document; instructions for prefetching a number of the related documents corresponding to a number of the links; and instructions for presenting the document to the user. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 60. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49

do not recite the above combination of features recited in claim 60. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 60.

For at least the foregoing reasons and for reasons similar to reasons given above with respect to claims that recite similar features, Appellants submit that the rejection of claim 60 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claims 60 be reversed.

19. Claim 61.

Independent claim 61 is directed to a method for facilitating a search, comprising detecting selection of one or more words in a document currently accessed by a user; generating a search query using the selected one or more words; retrieving a document based on the search query, the document including one or more links corresponding to a linked document; analyzing each of the links; prefetching a number of the linked documents corresponding to a number of the links; presenting the document to the user; receiving selection of one of the links; retrieving the linked document corresponding to the selected link; identifying one or more pieces of information in the retrieved document; determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and providing the determined links with the related document to the user. Kleinberg does not disclose or suggest this combination of features.

The Office Action does not address the features of claim 61. Instead, the Office Action alleges "[t]he elements of claims 50-61 are rejected in the analysis above and these claims are rejected on that basis" (Office Action, pg. 8). Appellants note that claims 2, 8, 13, 34, and 46-49 do not recite the above combination of features recited in claim 61. Accordingly, a *prima facie*

case of obviousness has not been established with respect to claim 61.

For at least the foregoing reasons and for reasons similar to reasons given above with respect to claims that recite similar features, Appellants submit that the rejection of claim 61 under 35 U.S.C. § 103(a) based on Kleinberg is improper. Accordingly, Appellants request that the rejection of claims 61 be reversed.

VIII. CONCLUSION

In view of the foregoing arguments, Appellants respectfully solicit the Honorable Board to reverse the Examiner's rejections of claims 1-61 under 35 U.S.C. §§ 112, first and second paragraphs, 102, and 103.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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IX. CLAIM APPENDIX

1. A computer-implemented method for performing a search, comprising:
obtaining selection of one or more groups of characters in a document currently accessed by a user, the obtaining comprising:
highlighting the one or more groups of characters in the document, and
selecting a search object while the one or more groups of characters are highlighted in the document;
generating a search query using the selected one or more groups of characters in response to selecting the search object;
retrieving search results based on the search query; and
presenting the search results to the user.
2. The method of claim 1, wherein the search object is located in at least one of a menu or toolbar.
3. The method of claim 1, wherein the obtaining selection includes:
receiving selection of a single group of characters in the document.
4. The method of claim 3, wherein the generating a search query includes:
using the selected group of characters as a search term for the search query.
5. The method of claim 1, wherein the obtaining selection includes:

receiving selection of a phrase in the document.

6. The method of claim 5, wherein the generating a search query includes:
using the selected phrase as a single search term for the search query.
7. The method of claim 5, wherein the generating a search query includes:
identifying words in the selected phrase, and
creating the search query by combining the identified words.
8. The method of claim 7, wherein the generating a search query further includes:
discarding those of the identified words from the search query that are
unnecessary for obtaining relevant search results.
9. The method of claim 1, wherein the obtaining selection includes:
receiving selection of a paragraph in the document.
10. The method of claim 9, wherein the generating a search query includes:
determining textual concepts in the selected paragraph, and
creating the search query from the determined textual concepts.
11. The method of claim 10, wherein the determining textual concepts includes:
using one of a summarization technique or a vector space model to identify the

textual concepts.

12. The method of claim 9, wherein the generating a search query includes:
using the selected paragraph as a search term for the search query.
13. The method of claim 12, wherein the using the selected paragraph includes:
discarding stop words in the selected paragraph from the search query.
14. The method of claim 1, wherein the obtaining selection includes:
receiving selection of the entire document.
15. The method of claim 14, wherein the generating a search query includes:
determining textual concepts in the document, and
generating the search query from the determined textual concepts.
16. The method of claim 15, wherein the determining textual concepts includes:
using one of a summarization technique or a vector space model to identify the
textual concepts.
17. The method of claim 14, wherein the generating a search query includes:
using the selected document as a search term for the search query.

18. The method of claim 1, wherein the retrieving search results includes:

generating a request based on the search query,
sending the request to a server connected to a network, and
receiving the search results from the server.

19. The method of claim 18, wherein the server includes at least one of a search engine or a hierarchical directory.

20. A system for performing a search, comprising:

means for receiving selection of one or more groups of characters in a document currently displayed to a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted;

means for generating a search query using the selected one or more words;

means for obtaining search results based on the search query; and

means for providing the search results to the user.

21. A system for facilitating performance of a search, comprising:

a browser configured to retrieve a document and present the document to a user;

and

a browser assistant configured to detect selection of one or more groups of characters in the document in response to the one or more groups of characters in the document

being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted, generate a search query from the selected one or more groups of characters, retrieve search results based on the search query, and present the search results to the user.

22. A web browser embodied in a computer-readable medium, comprising:

instructions for identifying a document;

instructions for obtaining selection of one or more groups of characters in the document in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted;

instructions for generating a search query from the selected one or more groups of characters;

instructions for obtaining search results based on the search query; and

instructions for providing the search results.

23. A computer-readable medium that stores instructions executable by at least one processor to perform a method for executing a search, comprising:

instructions for detecting selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted;

instructions for generating a search query using the selected one or more groups of characters;

instructions for retrieving search results based on the search query; and

instructions for presenting the search results to the user.

24. A method for performing a search in a network that includes a client and a server, comprising:

obtaining, by the client, selection of one or more groups of characters in a document currently accessed by a user in response to the one or more groups of characters in the document being highlighted and a search object being selected while the one or more groups of characters in the document are highlighted;

generating, by the client, a search query using the selected one or more groups of characters;

generating, by the server, search results based on the search query;

obtaining, by the client, the search results from the server; and

presenting, by the client, the search results to the user.

25. A method for prefetching documents associated with a search, comprising:
identifying a document that includes one or more links, each of the links corresponding to a linked document;

analyzing each of the links in the document;

determining a score for each of the links; and

prefetching a number of the linked documents corresponding to a number of the links based on the determined scores.

26. The method of claim 25, wherein the document includes a web page.

27. The method of claim 25, wherein the document includes a list of links or a hierarchical directory.

28. The method of claim 25, further comprising:
receiving selection of one of the links in the document;
determining whether the selected link corresponds to one of the prefetched documents, and
providing the one prefetched document when the selected link corresponds to the one prefetched document.

29. The method of claim 28, further comprising:
retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents.

30. The method of claim 25, further comprising:
performing an address lookup for a number of the links.

31. The method of claim 30, wherein the prefetching includes:
using the address lookup to prefetch the linked documents corresponding to the
number of the links.

32. The method of claim 25, wherein the prefetching includes:
prefetching the linked documents corresponding to all of the links in the
document.

33. The method of claim 25, wherein the determining a score includes:
for each of the linked documents, determining scores for one or more linking
documents that contain links to the linked document,
determining a score for each of the linked documents based on the scores of the
one or more linking documents, and
associating the determined scores for the linked documents with the
corresponding links.

34. The method of claim 25, wherein the determining a score includes:
determining a clickthrough rate for each of the linked documents,
determining a score for each of the linked documents based on the determined
clickthrough rates, and
associating the determined scores for the linked documents with the
corresponding links.

35. The method of claim 25, wherein the determining a score includes:
determining a popularity of each of the linked documents,
determining a score for each of the linked documents based on the determined popularity, and
associating the determined scores for the linked documents with the corresponding links.

36. The method of claim 35, wherein the determining a popularity includes:
for each of the linked documents, determining a popularity of a web site containing the linked document, and
associating the popularity of the web site to the linked document.

37. The method of claim 25, wherein the determining a score includes:
receiving a query from a user,
determining a score for each of the linked documents using the received query,
and
associating the determined scores for the linked documents with the corresponding links.

38. The method of claim 37, wherein the determining a score for each of the linked documents includes:

for each of the linked documents, comparing the query with contents of the linked document, and

determining a score for the linked document based on a degree of match between the query and the contents of the linked document.

39. The method of claim 25, wherein the determining a score includes:
receiving input from a user,
determining a score for each of the linked documents based on the received input,
and
associating the determined scores for the linked documents with the corresponding links.

40. The method of claim 39, wherein the determining a score for each of the linked documents includes:

for each of the linked documents, comparing one or more words of the received input with contents of the linked document, and

determining a score for the linked document based on a degree of match between the one or more words and the contents of the linked document.

41. The method of claim 25, wherein the prefetching includes:
retrieving the linked documents with scores of the corresponding links above a predetermined threshold.

42. A system for prefetching documents associated with a search, comprising:

- a browser configured to retrieve a document that includes one or more links, each of the links corresponding to a linked document; and
- a browser assistant configured to identify each of the links in the document, determine a score for each of the identified links, and prefetch a number of the linked documents corresponding to a number of the identified links based on the determined scores.

43. A web browser embodied in a computer-readable medium, comprising:

- instructions for identifying a document that includes one or more links, each of the links corresponding to a linked document;
- instructions for identifying each of the links in the document;
- instructions for determining a score for each of the identified links; and
- instructions for prefetching the linked documents corresponding to a number of the identified links based on the determined scores.

44. A computer-readable medium that stores instructions executable by at least one processor to perform a method for prefetching documents associated with a search, comprising:

- instructions for obtaining search results that include one or more links, each of the links corresponding to a linked document;
- instructions for analyzing each of the links;
- instructions for determining a score for each of the links; and

instructions for prefetching the linked documents corresponding to a number of the links based on the determined scores.

45. A method for prefetching documents associated with a search in a network that includes a client and a plurality of servers, comprising:

requesting, by the client, a document that includes one or more links, each of the links corresponding to a linked document;

providing, by one of the servers, the requested document to the client;

analyzing, by the client, each of the links in the requested document;

determining, by the client, a score for each of the links;

requesting, by the client, a number of the linked documents corresponding to a number of the links based on the determined scores; and

providing, by one or more of the servers, the requested linked documents to the client.

46. A computer-implemented method for supplementing a document with links to related documents, comprising:

analyzing a document to identify one or more pieces of information;

determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and

adding the links to the document.

47. The method of claim 46, wherein the pieces of information include at least one of a name, a product, a publication, or a key phrase.

48. The method of claim 47, wherein when the pieces of information include one or more names, the determining a link includes:

for each of the names, identifying one or more related documents that include a link associated with the name, and

determining one or more links corresponding to the identified documents.

49. The method of claim 47, wherein when the pieces of information include information regarding one or more products, the determining a link includes:

for each of the products, identifying one or more related documents associated with at least one of a producer, a seller, or a review of the product, and

determining one or more links corresponding to the identified documents.

50. The method of claim 47, wherein when the pieces of information include information regarding one or more publications, the determining a link includes:

for each of the publications, identifying one or more related documents that include the publication, and

determining one or more links corresponding to the identified documents.

51. The method of claim 47, wherein when the pieces of information include one or more key phrases, the determining a link includes:

for each of the key phrases, identifying one or more related documents that include the key phrase, and

determining one or more links corresponding to the identified documents.

52. The method of claim 46, wherein the determining a link includes:

sending each of the identified pieces of information to a server, and

receiving a link corresponding to each of the identified pieces of information from the server.

53. The method of claim 46, wherein the search is performed using one of a search engine or a hierarchical directory.

54. The method of claim 46, wherein the adding the links includes:

modifying the document to include the links.

55. The method of claim 46, wherein the adding the links includes:

providing a separate document that includes the links.

56. A system for supplementing a document with links to related documents, comprising:

a browser configured to identify a document; and

a browser assistant configured to

analyze the document to identify one or more pieces of information,

determine a link to a related document for each of the identified pieces of

information by performing a search of a set of documents based on each of the identified pieces

of information, and

provide the determined links with the document.

57. A web browser embodied in a computer-readable medium, comprising:

instructions for identifying a document;

instructions for analyzing the document to identify one or more pieces of

information;

instructions for determining a link to a related document for each of the identified

pieces of information by performing a search of a set of documents based on each of the

identified pieces of information;

instructions for presenting the document with the determined links to a user.

58. A computer-readable medium that stores instructions executable by at least one

processor to perform a method for supplementing a document with links to related documents,

comprising:

instructions for identifying one or more pieces of information in the document;

instructions for determining a link to a related document for each of the identified

pieces of information by performing a search of a set of documents using each of the identified pieces of information; and

instructions for providing the determined links with the document.

59. A method for supplementing a document with links to related documents in a network that includes a client and a server, comprising:

requesting, by the client, a document;

providing, by the server, the requested document to the client;

analyzing, by the client, the requested document to identify one or more pieces of information;

determining, by the client, a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and

modifying, by the client, the requested document to include the links.

60. A hypertext browser assistant embodied in a computer-readable medium, comprising:

instructions for detecting selection of one or more words in a document currently accessed by a user;

instructions for generating a search query using the selected one or more words;

instructions for retrieving a document based on the search query;

instructions for identifying one or more pieces of information in the document;

instructions for determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information;

instructions for adding the links to the document;

instructions for prefetching a number of the related documents corresponding to a number of the links; and

instructions for presenting the document to the user.

61. A method for facilitating a search, comprising:

detecting selection of one or more words in a document currently accessed by a user;

generating a search query using the selected one or more words;

retrieving a document based on the search query, the document including one or more links corresponding to a linked document;

analyzing each of the links;

prefetching a number of the linked documents corresponding to a number of the links;

presenting the document to the user;

receiving selection of one of the links;

retrieving the linked document corresponding to the selected link;

identifying one or more pieces of information in the retrieved document;

determining a link to a related document for each of the identified pieces of

information by performing a search of a set of documents based on each of the identified pieces of information; and

providing the determined links with the related document to the user.

X. EVIDENCE APPENDIX

None.

XI. RELATED PROCEEDINGS APPENDIX

None.